

Exhibit J2

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1 IN THE UNITED STATES DISTRICT COURT

2 FOR THE SOUTHERN DISTRICT OF NEW YORK

3 -----x

4 Eastern Profit CORPORATION LIMITED,

5 Plaintiff,

6 -against-

Case No. 18-cv-2185 (JGK)

7 Strategic Vision US, LLC,

8 Defendant.

9 -----x

10 August 2, 2019

11 9:51 a.m.

12

13 Deposition of GUO WENGUI, held at the offices of Hodgson
14 Russ, 605 Third Avenue, Suite 2300, New York, New York,
15 pursuant to Notice, before Renate Reid, Registered Professional
16 Reporter and Notary Public of the State of New York.

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<p>1 Guo Wengui</p> <p>2 A. No.</p> <p>3 Q. What is your current residential</p> <p>4 address?</p> <p>5 A. I cannot really say it in English, so 09:55</p> <p>6 it's Sidney Hotel, 781 Fifth Avenue.</p> <p>7 MR. HARMON: It's Sherry.</p> <p>8 A. Sherry.</p> <p>9 MR. HARMON: S-h-e-r-r-y.</p> <p>10 A. Sherry Hotel. 09:56</p> <p>11 BY MR. GREIM:</p> <p>12 Q. Mr. Guo, can you please tell us all the</p> <p>13 legal names that you have used anywhere in the</p> <p>14 world.</p> <p>15 MR. HARMON: Object to the form of the 09:56</p> <p>16 question.</p> <p>17 A. I don't understand the question.</p> <p>18 MR. HARMON: Just a clarification.</p> <p>19 When I object to the form of the question, do you</p> <p>20 translate my objection for the witness? 09:56</p> <p>21 MR. GREIM: I think he -- I think he</p> <p>22 should.</p> <p>23 MR. HARMON: Yes.</p> <p>24 MR. GREIM: Yeah.</p> <p>25 MR. HARMON: I -- I think he has to, 09:56</p> <p style="text-align: right;">Page 6</p>	<p>1 Guo Wengui</p> <p>2 A. So you mean which province and which</p> <p>3 city?</p> <p>4 Q. Yes.</p> <p>5 A. Shandong province. 09:58</p> <p>6 Q. In what city?</p> <p>7 A. Liaocheng City.</p> <p>8 Q. In what countries do you hold</p> <p>9 citizenship?</p> <p>10 A. My citizenship is Hong Kong. 09:59</p> <p>11 Q. For what countries do you hold</p> <p>12 passports?</p> <p>13 A. Hong Kong.</p> <p>14 Q. Where else?</p> <p>15 A. You mean at present, currently? 09:59</p> <p>16 Q. Yes.</p> <p>17 A. Hong Kong passport.</p> <p>18 Q. In the last five years, for what</p> <p>19 countries have you held active passports?</p> <p>20 A. Abu Dhabi, Malatu (phonetic). 10:00</p> <p>21 Q. Have you claimed to hold 11 passports</p> <p>22 within the last three years? (DIR)</p> <p>23 MR. HARMON: Don't answer the question.</p> <p>24 Next question, please.</p> <p>25 MR. GREIM: We need an answer to that 10:01</p> <p style="text-align: right;">Page 8</p>
<p>1 Guo Wengui</p> <p>2 but I want to make sure that he is.</p> <p>3 BY MR. GREIM:</p> <p>4 Q. Mr. Guo, what is your legal name?</p> <p>5 MR. HARMON: Object to the form of the 09:56</p> <p>6 question.</p> <p>7 A. So I don't need to answer this</p> <p>8 question?</p> <p>9 MR. HARMON: You do.</p> <p>10 A. Haoyun Guo. 09:57</p> <p>11 MR. GREIM: Could you spell that for</p> <p>12 the record, Mr. Translator?</p> <p>13 INTERPRETER: H-a-o-y-u-n -- that's</p> <p>14 first name; last name is G-u-o.</p> <p>15 BY MR. GREIM: 09:57</p> <p>16 Q. Do you also go by Guo Wengui?</p> <p>17 A. Yes.</p> <p>18 Q. What other names do you go by?</p> <p>19 A. Miles Kwok, my English name.</p> <p>20 Q. What else? 09:58</p> <p>21 A. No, not that I can recall.</p> <p>22 Q. When and where you were born?</p> <p>23 A. I was born on May 10, 1968. I was born</p> <p>24 in China.</p> <p>25 Q. Where in China? 09:58</p> <p style="text-align: right;">Page 7</p>	<p>1 Guo Wengui</p> <p>2 question.</p> <p>3 MR. HARMON: He's not answering the</p> <p>4 question.</p> <p>5 Next question. 10:01</p> <p>6 MR. GREIM: On what basis, Counsel?</p> <p>7 MR. HARMON: It has nothing to do with</p> <p>8 the lawsuit. It's personally harassing of him.</p> <p>9 He's here as a nonparty witness. He's not</p> <p>10 answering the question. 10:01</p> <p>11 If you have other questions for him,</p> <p>12 please go ahead.</p> <p>13 MR. GREIM: We'll just mark this part</p> <p>14 of the transcript.</p> <p>15 BY MR. GREIM: 10:01</p> <p>16 Q. What is your current legal status in</p> <p>17 the United States?</p> <p>18 A. Political asylum.</p> <p>19 Q. You mean you're claiming political</p> <p>20 asylum? 10:01</p> <p>21 A. I'm in the process of application.</p> <p>22 Q. When is the last time that you left</p> <p>23 this country? (DIR)</p> <p>24 MR. HARMON: Okay. We're not answering</p> <p>25 the question. 10:01</p> <p style="text-align: right;">Page 9</p>

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<p>1 Guo Wengui</p> <p>2 question is either "yes" or "no," because the</p> <p>3 communications with counsel are privileged.</p> <p>4 A. No.</p> <p>5 BY MR. GREIM: 10:10</p> <p>6 Q. Have you begun to gather any video or</p> <p>7 audio recordings of communications or meetings</p> <p>8 that were held at your apartment?</p> <p>9 MR. HARMON: Object to the form of the</p> <p>10 question. 10:10</p> <p>11 A. Do I have to answer this question?</p> <p>12 MR. HARMON: Yes.</p> <p>13 BY MR. GREIM:</p> <p>14 Q. Yes.</p> <p>15 A. No. 10:11</p> <p>16 Q. Have you been asked to gather any video</p> <p>17 or audio recordings of communications or meetings</p> <p>18 at your apartment regarding this case?</p> <p>19 MR. HARMON: Again, the answer to the</p> <p>20 question is "yes" or "no," because communications 10:11</p> <p>21 between counsel will be privileged.</p> <p>22 A. So your question is, has my counsel</p> <p>23 asked me to gather any audio and video recordings</p> <p>24 about communications and meetings at my apartment</p> <p>25 regarding this case, right? 10:12</p> <p style="text-align: right;">Page 14</p>	<p>1 Guo Wengui</p> <p>2 Approximately how many hours of</p> <p>3 recordings do you believe you have, to produce</p> <p>4 regarding this case?</p> <p>5 MR. HARMON: Object to the form of the 10:15</p> <p>6 question.</p> <p>7 A. I don't know how to answer this</p> <p>8 question.</p> <p>9 BY MR. GREIM:</p> <p>10 Q. What -- what about the question 10:15</p> <p>11 confuses you?</p> <p>12 MR. HARMON: Object to the form of the</p> <p>13 question.</p> <p>14 A. I don't understand the questions,</p> <p>15 because -- I don't understand the logic of the 10:15</p> <p>16 questions, because I'm here for deposition. So</p> <p>17 you keep asking me about the amount of recordings.</p> <p>18 CHECK INTERPRETER: But you did not ask</p> <p>19 me whether I have or not, about this recording.</p> <p>20 A. So it's like, during the movies, you 10:16</p> <p>21 know, you already make the assumptions that I</p> <p>22 already -- you already made the assumptions that</p> <p>23 I'm already in possession of those recordings.</p> <p>24 INTERPRETER: Sorry about that, sir.</p> <p>25 First time we meet. 10:16</p> <p style="text-align: right;">Page 16</p>
<p>1 Guo Wengui</p> <p>2 BY MR. GREIM:</p> <p>3 Q. Correct.</p> <p>4 A. I can only answer "yes" or "no," right?</p> <p>5 MR. HARMON: Yes, you can only say 10:12</p> <p>6 "yes" or "no."</p> <p>7 A. Yes.</p> <p>8 BY MR. GREIM:</p> <p>9 Q. Have you begun to gather the audio and</p> <p>10 video recordings I mentioned in my last question? 10:13</p> <p>11 MR. HARMON: Object to the form of the</p> <p>12 question.</p> <p>13 A. Yes.</p> <p>14 BY MR. GREIM:</p> <p>15 Q. Is your -- strike that. 10:14</p> <p>16 What is the approximate volume of audio</p> <p>17 and video recordings that you possess regarding</p> <p>18 the allegations in this case?</p> <p>19 MR. HARMON: Object to the form of the</p> <p>20 question. 10:14</p> <p>21 A. I don't know. I can't give an accurate</p> <p>22 answer to this question.</p> <p>23 BY MR. GREIM:</p> <p>24 Q. How many hours of recordings do you</p> <p>25 have regarding -- let me -- let me strike that. 10:14</p> <p style="text-align: right;">Page 15</p>	<p>1 Guo Wengui</p> <p>2 BY MR. GREIM:</p> <p>3 Q. Do you have any recordings of video --</p> <p>4 I'm sorry.</p> <p>5 Do you have any video or audio recordings 10:17</p> <p>6 of communications or meetings between yourself or</p> <p>7 Yvette Wang or Lianchao Han and either French</p> <p>8 Wallop or Mike Waller?</p> <p>9 A. No. How come you did not ask this</p> <p>10 question first? 10:17</p> <p>11 Q. Have you ever had audio or video</p> <p>12 recordings of communications between yourself,</p> <p>13 Yvette Wang, Lianchao Han and either French Wallop</p> <p>14 or Mike Waller?</p> <p>15 A. No, I don't have it personally. Never 10:18</p> <p>16 have it personally. So I would like to emphasize,</p> <p>17 personally, I do not have those recordings.</p> <p>18 However, I live in a hotel. In public spaces, the</p> <p>19 hotel has set up cameras, so I can only emphasize</p> <p>20 that, personally, I don't have personal possession 10:18</p> <p>21 of those recordings. And, also, I would like to</p> <p>22 emphasize, I live -- I stay at a hotel, Sherry</p> <p>23 Hotel.</p> <p>24 Q. Mr. Guo, do you have microphones or</p> <p>25 cameras installed in your apartment? 10:19</p> <p style="text-align: right;">Page 17</p>

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<p>1 Guo Wengui</p> <p>2 A. Yes, many.</p> <p>3 Q. Who installed them?</p> <p>4 A. Security companies and the hotel</p> <p>5 management company. And, also, some of them came 10:19</p> <p>6 with the purchase of this apartment,</p> <p>7 pre-installed.</p> <p>8 Q. What security company installed</p> <p>9 microphones and cameras in your apartment?</p> <p>10 A. I can't recall the name of that 10:20</p> <p>11 company.</p> <p>12 Q. Is it T&M Security?</p> <p>13 A. Yes.</p> <p>14 Q. Do you have access to the recordings</p> <p>15 that are made by the microphones or cameras? 10:20</p> <p>16 MR. HARMON: Object to the form of the</p> <p>17 question.</p> <p>18 A. No. Personally, no.</p> <p>19 BY MR. GREIM:</p> <p>20 Q. So is it your testimony that 10:21</p> <p>21 microphones and cameras installed in your</p> <p>22 apartment are able to record conversations in your</p> <p>23 apartment, but you're not able to access the</p> <p>24 recordings?</p> <p>25 MR. HARMON: Object to the form of the 10:21</p> <p style="text-align: right;">Page 18</p>	<p>1 Guo Wengui</p> <p>2 figure out that question. I don't know.</p> <p>3 BY MR. GREIM:</p> <p>4 Q. Can Yvette Wang access the recordings?</p> <p>5 MR. HARMON: Object to the form of the 10:23</p> <p>6 question.</p> <p>7 A. I don't know.</p> <p>8 BY MR. GREIM:</p> <p>9 Q. Can -- can Golden Spring access the</p> <p>10 recordings? 10:24</p> <p>11 MR. HARMON: Object to the form of the</p> <p>12 question.</p> <p>13 A. I don't know.</p> <p>14 BY MR. GREIM:</p> <p>15 Q. Can Eastern Profit access the 10:24</p> <p>16 recordings?</p> <p>17 MR. HARMON: Object to the form of the</p> <p>18 question.</p> <p>19 A. No. I don't know.</p> <p>20 BY MR. GREIM: 10:24</p> <p>21 Q. Isn't it true that some of these</p> <p>22 recordings have appeared on the Internet?</p> <p>23 MR. HARMON: Object to the form of the</p> <p>24 question.</p> <p>25 A. I don't know. 10:24</p> <p style="text-align: right;">Page 20</p>
<p>1 Guo Wengui</p> <p>2 question.</p> <p>3 A. Personally, I'm not tech-savvy, so I</p> <p>4 don't know how to gain those information, because</p> <p>5 I do not have the technical background to access 10:22</p> <p>6 that information.</p> <p>7 CHECK INTERPRETER: Nor speaking</p> <p>8 English.</p> <p>9 A. Nor do I speak English.</p> <p>10 BY MR. GREIM: 10:22</p> <p>11 Q. Mr. Guo, who does have access to the</p> <p>12 recordings that are made by these microphones and</p> <p>13 cameras?</p> <p>14 MR. HARMON: Object to the form of the</p> <p>15 question. 10:22</p> <p>16 A. What do you mean, "access"? Authority,</p> <p>17 access? I think this is too technical. I mean,</p> <p>18 you have to -- you have to ask the question in</p> <p>19 plain language.</p> <p>20 BY MR. GREIM: 10:23</p> <p>21 Q. Who has authority to retrieve the</p> <p>22 recordings from the microphones and cameras?</p> <p>23 MR. HARMON: Object to the form of the</p> <p>24 question.</p> <p>25 A. I don't know. I never -- I never 10:23</p> <p style="text-align: right;">Page 19</p>	<p>1 Guo Wengui</p> <p>2 BY MR. GREIM:</p> <p>3 Q. Does T&M Security have access to the</p> <p>4 recordings?</p> <p>5 MR. HARMON: Object to the form of the 10:24</p> <p>6 question.</p> <p>7 A. I don't know.</p> <p>8 BY MR. GREIM:</p> <p>9 Q. Did they have access to the recordings?</p> <p>10 A. I don't know. 10:25</p> <p>11 Q. Is T&M Security -- do they still --</p> <p>12 does T&M Security still work for you?</p> <p>13 MR. HARMON: Object to the form of the</p> <p>14 question.</p> <p>15 A. No, not anymore. 10:25</p> <p>16 BY MR. GREIM:</p> <p>17 Q. Where are the recordings stored?</p> <p>18 MR. HARMON: Object to the form of the</p> <p>19 question.</p> <p>20 A. I don't know. 10:25</p> <p>21 BY MR. GREIM:</p> <p>22 Q. Have you ever viewed or listened to any</p> <p>23 recording that has been made in your apartment</p> <p>24 from the microphones or the cameras?</p> <p>25 A. You mean, from when? 10:26</p> <p style="text-align: right;">Page 21</p>

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<p>1 Guo Wengui</p> <p>2 Q. In the last four years.</p> <p>3 A. You mean ever listen or view? I can't</p> <p>4 recall. I can't recall. 10:26</p> <p>5 Q. Have the cameras and microphones ever</p> <p>6 been active?</p> <p>7 A. I don't know.</p> <p>8 Q. So do you believe that the</p> <p>9 Sherry-Netherland is recording your actions and</p> <p>10 discussions in your apartment? 10:27</p> <p>11 MR. HARMON: Object to the form of the</p> <p>12 question.</p> <p>13 A. I don't know.</p> <p>14 BY MR. GREIM:</p> <p>15 Q. Do you currently -- strike that. 10:27</p> <p>16 Have you retained a security company to</p> <p>17 take the place of T&M Security?</p> <p>18 A. No.</p> <p>19 Q. I want to be sure that this part of</p> <p>20 your testimony is clear. 10:28</p> <p>21 MR. HARMON: Wait. There's no question</p> <p>22 yet.</p> <p>23 MR. GREIM: Go ahead. Translate what</p> <p>24 he said.</p> <p>25 A. That's your way of asking questions. 10:28</p> <p style="text-align: right;">Page 22</p>	<p>1 Guo Wengui</p> <p>2 the judge.</p> <p>3 BY MR. GREIM:</p> <p>4 Q. Okay. I am seeking your understanding.</p> <p>5 A. So you can just ask me questions 10:31</p> <p>6 directly, because we're not -- you don't need to</p> <p>7 know much about me, you know, because we're not</p> <p>8 dating.</p> <p>9 Q. Is it your belief that you do not have</p> <p>10 the authority to access recordings made in your 10:31</p> <p>11 apartment?</p> <p>12 MR. HARMON: Object to the form of the</p> <p>13 question.</p> <p>14 A. I don't know, because this question, I</p> <p>15 need to refer to my -- refer this question to my 10:32</p> <p>16 counsel.</p> <p>17 BY MR. GREIM:</p> <p>18 Q. Have you tried to determine whether you</p> <p>19 have authority to access recordings made in your</p> <p>20 apartment? 10:32</p> <p>21 MR. HARMON: Object to the form.</p> <p>22 A. No.</p> <p>23 BY MR. GREIM:</p> <p>24 Q. Now I'm going to ask about physical</p> <p>25 access. 10:32</p> <p style="text-align: right;">Page 24</p>
<p>1 Guo Wengui</p> <p>2 I'm just doing my job.</p> <p>3 CHECK INTERPRETER: I'm only here to</p> <p>4 answer questions.</p> <p>5 BY MR. GREIM: 10:29</p> <p>6 Q. So I'm now going to ask you a question</p> <p>7 that will distinguish between the authority to</p> <p>8 access recordings and the physical ability to</p> <p>9 access recordings.</p> <p>10 Is it your testimony today that you do 10:29</p> <p>11 not have the legal authority to access recordings,</p> <p>12 video or audio recordings, made in your apartment?</p> <p>13 MR. HARMON: Object to the form of the</p> <p>14 question.</p> <p>15 A. So it depends on, you know, the legal 10:30</p> <p>16 system here in the U.S. You are not the judge, so</p> <p>17 you cannot decide whether --</p> <p>18 BY MR. GREIM:</p> <p>19 Q. I -- I --</p> <p>20 MR. HARMON: Go ahead. Get a 10:30</p> <p>21 translation, unless you secretly understand</p> <p>22 Chinese.</p> <p>23 A. So you are the legal counsel for the</p> <p>24 defendant, and you cannot dictate who has access</p> <p>25 and who does not have access. Everything is up to 10:31</p> <p style="text-align: right;">Page 23</p>	<p>1 Guo Wengui</p> <p>2 Have you tried to physically access</p> <p>3 recordings of conversations in your apartment in</p> <p>4 the last four years?</p> <p>5 MR. HARMON: Object to the form of the 10:33</p> <p>6 question.</p> <p>7 A. No.</p> <p>8 BY MR. GREIM:</p> <p>9 Q. Do you know whether any intelligence</p> <p>10 service has installed cameras or microphones in 10:33</p> <p>11 your apartment?</p> <p>12 A. I don't know.</p> <p>13 Q. Have you claimed that an intelligence</p> <p>14 service has installed cameras or microphones in</p> <p>15 your apartment? (DIR) 10:33</p> <p>16 MR. HARMON: Direct the witness not to</p> <p>17 answer.</p> <p>18 Next question, please.</p> <p>19 BY MR. GREIM:</p> <p>20 Q. Do you refuse to answer that question? 10:34</p> <p>21 A. Yes, I refuse.</p> <p>22 Q. Have you made that statement to French</p> <p>23 Wallop or Michael -- Michael Waller? (DIR)</p> <p>24 MR. HARMON: Direct the witness --</p> <p>25 direct the witness not to answer. 10:34</p> <p style="text-align: right;">Page 25</p>

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<p>1 Guo Wengui</p> <p>2 BY MR. GREIM:</p> <p>3 Q. The witness is nodding your head.</p> <p>4 By that, do you mean that you will not</p> <p>5 answer? 10:34</p> <p>6 A. I do not answer this question.</p> <p>7 Q. Are you aware whether your</p> <p>8 conversations in May of 2017 with agents of the</p> <p>9 Chinese Communist Party and the People's Republic</p> <p>10 of China were recorded and placed on the Internet? 10:35</p> <p>11 (DIR)</p> <p>12 MR. HARMON: Direct the witness not to</p> <p>13 answer the question.</p> <p>14 A. I don't want to answer this question.</p> <p>15 BY MR. GREIM: 10:36</p> <p>16 Q. Have you had any conversations with</p> <p>17 members of the Chinese Communist Party or the</p> <p>18 People's Republic of China -- I'm sorry. Let me</p> <p>19 strike that and start again.</p> <p>20 Have you had any conversations with 10:36</p> <p>21 members of the Chinese Communist Party or</p> <p>22 officials of the People's Republic of China</p> <p>23 regarding the research efforts for which Strategic</p> <p>24 Vision was hired? (DIR)</p> <p>25 MR. HARMON: Direct the witness not to 10:36</p> <p style="text-align: right;">Page 26</p>	<p>1 Guo Wengui</p> <p>2 question?</p> <p>3 A. I refuse to answer the question.</p> <p>4 MR. HARMON: Again, when -- when I</p> <p>5 intend to direct you not to answer -- 10:38</p> <p>6 THE WITNESS: I understand.</p> <p>7 MR. HARMON: Okay.</p> <p>8 BY MR. GREIM:</p> <p>9 Q. So are you refusing to answer the</p> <p>10 question, even though counsel has not directed you 10:38</p> <p>11 not to answer?</p> <p>12 MR. HARMON: The answer would be "yes"</p> <p>13 or "no"; not whether she is or isn't, but whether</p> <p>14 you know.</p> <p>15 A. I know her identity. 10:39</p> <p>16 BY MR. GREIM:</p> <p>17 Q. My question was not whether you know</p> <p>18 her identity.</p> <p>19 My question was whether you know whether</p> <p>20 she is a member of the Chinese Communist Party. 10:39</p> <p>21 MR. HARMON: "Yes" or "no."</p> <p>22 A. I know.</p> <p>23 BY MR. GREIM:</p> <p>24 Q. And just to be clear, is that a "yes"</p> <p>25 to my question? 10:40</p> <p style="text-align: right;">Page 28</p>
<p>1 Guo Wengui</p> <p>2 answer.</p> <p>3 A. I refuse to answer this question.</p> <p>4 BY MR. GREIM:</p> <p>5 Q. Have you had conversations with Yvette 10:37</p> <p>6 Wang regarding the research efforts for which</p> <p>7 Strategic Vision was hired?</p> <p>8 MR. HARMON: Object to the form of the</p> <p>9 question.</p> <p>10 A. I refuse to answer this question. 10:37</p> <p>11 MR. HARMON: Okay. So -- so once</p> <p>12 again, please advise the witness that when I</p> <p>13 object to the form, it's not a direction for him</p> <p>14 not to answer. When I intend to direct him not to</p> <p>15 answer, I will do so directly. 10:37</p> <p>16 A. Of course, I had discussions with</p> <p>17 Yvette.</p> <p>18 BY MR. GREIM:</p> <p>19 Q. Is Yvette Wang a member of the Chinese</p> <p>20 Communist Party? (DIR) 10:38</p> <p>21 MR. HARMON: Object to -- I'm sorry.</p> <p>22 Direct the witness not to answer.</p> <p>23 A. I refuse to answer this question.</p> <p>24 BY MR. GREIM:</p> <p>25 Q. Do you know the answer to that 10:38</p> <p style="text-align: right;">Page 27</p>	<p>1 Guo Wengui</p> <p>2 MR. HARMON: Which question?</p> <p>3 MR. GREIM: He answered "I know" to my</p> <p>4 question. You asked him to say "yes" or "no." He</p> <p>5 said "I know." I'm going to make sure it's clear 10:40</p> <p>6 in the transcript that his answer is "yes."</p> <p>7 MR. HARMON: I just want to be clear.</p> <p>8 So the -- the question is, Do you know</p> <p>9 whether or not Yvette is a member of the Communist</p> <p>10 Party? Yes or no. 10:40</p> <p>11 A. I know. I know.</p> <p>12 INTERPRETER: He said, "I know."</p> <p>13 He said I'm doing a good job, he said.</p> <p>14 BY MR. GREIM:</p> <p>15 Q. Have you discussed with French Wallop 10:40</p> <p>16 or Mike Waller Yvette Wang's membership in the</p> <p>17 Communist Party?</p> <p>18 MR. HARMON: Object to the form of the</p> <p>19 question.</p> <p>20 Do you mean whether or not she's a 10:41</p> <p>21 member? because the way you phrased the question</p> <p>22 assumes that she is.</p> <p>23 MR. GREIM: I -- I do mean whether or</p> <p>24 not. I meant the subject of --</p> <p>25 MR. HARMON: Thank you. 10:41</p> <p style="text-align: right;">Page 29</p>

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<p>1 Guo Wengui</p> <p>2 MR. GREIM: -- not the fact of.</p> <p>3 Let's go back. Let's go back.</p> <p>4 BY MR. GREIM:</p> <p>5 Q. Have you discussed with French Waller 10:41</p> <p>6 or Mike Waller -- French Wallop or Mike Waller</p> <p>7 whether Yvette Wang is a member of the Chinese</p> <p>8 Communist Party?</p> <p>9 A. I told them, Yvette Wang is a Communist</p> <p>10 party who got persecuted, who got threatened by 10:42</p> <p>11 the Chinese Communist Party. They might kill her.</p> <p>12 MR. HARMON: What was the end of that?</p> <p>13 CHECK INTERPRETER: And they know</p> <p>14 where -- they know clearly.</p> <p>15 A. They know clearly. I told them. 10:42</p> <p>16 BY MR. GREIM:</p> <p>17 Q. I'm sorry to ask you this again, but I</p> <p>18 think I have to.</p> <p>19 Did you tell Mr. Waller and Ms. Wallop</p> <p>20 that Yvette Wang was a member of the Communist 10:42</p> <p>21 Party?</p> <p>22 A. I told them she's a Communist Party</p> <p>23 member who got persecuted by the Chinese Communist</p> <p>24 Party, who got threatened by the party.</p> <p>25 CHECK INTERPRETER: And that -- 10:43</p> <p style="text-align: right;">Page 30</p>	<p>1 Guo Wengui</p> <p>2 A. Yes. Our goal is the same.</p> <p>3 CHECK INTERPRETER: Overthrow the</p> <p>4 Chinese Communist Party.</p> <p>5 A. To overthrow the Chinese Communist 10:46</p> <p>6 Party.</p> <p>7 BY MR. GREIM:</p> <p>8 Q. Was that a true statement?</p> <p>9 A. I always tell the truth. So there's no</p> <p>10 reason for me to spend money, to spend my energy 10:46</p> <p>11 just telling lies to those two persons.</p> <p>12 Q. Well, are you a dissident?</p> <p>13 MR. HARMON: Object to the form of the</p> <p>14 question.</p> <p>15 A. I'm a person who is dedicated to 10:46</p> <p>16 overthrow the Chinese party. Of course, I'm a</p> <p>17 dissident.</p> <p>18 BY MR. GREIM:</p> <p>19 Q. Do you want to eliminate one-party rule</p> <p>20 in China? (DIR) 10:47</p> <p>21 MR. HARMON: Direct the witness not to</p> <p>22 answer.</p> <p>23 BY MR. GREIM:</p> <p>24 Q. Respectfully --</p> <p>25 MR. GRENDI: What did he -- what did he 10:47</p> <p style="text-align: right;">Page 32</p>
<p>1 Guo Wengui</p> <p>2 A. And they -- and she's part of us,</p> <p>3 trying to overthrow the party.</p> <p>4 BY MR. GREIM:</p> <p>5 Q. And did you tell them in 2018 that, at 10:43</p> <p>6 that time, Yvette was still a member of the</p> <p>7 Communist Party?</p> <p>8 A. No. I never said that. It was -- it</p> <p>9 was a lie. Super liar. Super liar.</p> <p>10 Q. When you told them that she's a 10:44</p> <p>11 Communist Party member, was that the truth?</p> <p>12 MR. HARMON: Object to the form of the</p> <p>13 question.</p> <p>14 A. So I'm going to tell you one more time.</p> <p>15 When I told them about Yvette Wang, I told them 10:45</p> <p>16 that Wang was a party member who got robbed, who</p> <p>17 got robbed of everything, whose family got</p> <p>18 kidnapped, whose goal is to overthrow the Chinese</p> <p>19 Communist Party.</p> <p>20 BY MR. GREIM: 10:45</p> <p>21 Q. When did you make those statements?</p> <p>22 A. I mentioned that during our first and</p> <p>23 second meeting, even the third meeting.</p> <p>24 Q. Did you tell French Wallop and Mike</p> <p>25 Waller that you shared those goals? 10:45</p> <p style="text-align: right;">Page 31</p>	<p>1 Guo Wengui</p> <p>2 say?</p> <p>3 INTERPRETER: Sorry.</p> <p>4 A. I'm not going to answer this question.</p> <p>5 BY MR. GREIM: 10:47</p> <p>6 Q. Do you want to undermine the current</p> <p>7 leadership of the People's Republic of China?</p> <p>8 A. I'm not just trying to undermine the</p> <p>9 government; I'm trying to eliminate the current 10:47</p> <p>10 government, to -- I'm trying to eliminate the</p> <p>11 party, Chinese Communist Party, to bring rule of</p> <p>12 law and freedom to China.</p> <p>13 Q. Does that include eliminating Chairman</p> <p>14 Xi Jinping? (DIR)</p> <p>15 MR. HARMON: Direct the witness not to 10:48</p> <p>16 answer.</p> <p>17 A. I want to answer this question.</p> <p>18 Of course, including him. I would like</p> <p>19 to emphasize one more time, anybody who's done 10:48</p> <p>20 harm to the Chinese people, including people from</p> <p>21 Xinjiang (phonetic), we're going to bring them</p> <p>22 down; we're going to eliminate them, including</p> <p>23 Xi Jinping.</p> <p>24 CHECK INTERPRETER: The witness</p> <p>25 actually said that we need to bring them to be 10:49</p> <p style="text-align: right;">Page 33</p>

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<p>1 Guo Wengui</p> <p>2 tried by the rule of law.</p> <p>3 MR. GRENDI: Do we have to go off the</p> <p>4 record here? Do we need to go off the record here</p> <p>5 regarding translation? because it seems to me 10:49</p> <p>6 there's a recurring theme here where the</p> <p>7 translator is missing something and we're getting</p> <p>8 a correction here. And he's not contesting it.</p> <p>9 MR. GREIM: I disagree. I don't think</p> <p>10 we have a problem. We've only had a few 10:49</p> <p>11 corrections, and we're fixing it as we go.</p> <p>12 MR. HARMON: Lord knows, Zach, that</p> <p>13 I -- I hate to agree with Eddie; but, in fact, I</p> <p>14 don't think there's a problem until we run into a</p> <p>15 situation where our private translator corrects an 10:49</p> <p>16 error and the official translator disagrees with</p> <p>17 her. So as long as -- as you pointed out, Zach,</p> <p>18 as long as the correction is made and not</p> <p>19 contested, then I think we all agree that the</p> <p>20 corrected testimony is the testimony that was 10:49</p> <p>21 given.</p> <p>22 Is that fair to say?</p> <p>23 MR. GRENDI: I'm fine with that. I'm</p> <p>24 just noting my concern for the record.</p> <p>25 MR. HARMON: Okay. Is that fair to 10:50</p> <p style="text-align: right;">Page 34</p>	<p>1 Guo Wengui</p> <p>2 A. Between -- I don't recall the exact</p> <p>3 dates, but it's probably between November 2017 and</p> <p>4 February 2018, when we signed the contract.</p> <p>5 Q. Have you engaged anyone other than 10:53</p> <p>6 Strategic Vision to accomplish the goal that you</p> <p>7 described to us? (DIR)</p> <p>8 MR. HARMON: Direct the witness not to</p> <p>9 answer.</p> <p>10 A. I refuse to answer this question. 10:53</p> <p>11 BY MR. GREIM:</p> <p>12 Q. After your contract with Strategic</p> <p>13 Vision was terminated, did you engage any other</p> <p>14 entity to provide the services that you sought</p> <p>15 from Strategic Vision? (DIR) 10:53</p> <p>16 MR. GRENDI: Object to the form of the</p> <p>17 question.</p> <p>18 MR. HARMON: Object to the form of the</p> <p>19 question and direct the witness not to answer.</p> <p>20 A. I refuse to answer. 10:54</p> <p>21 MR. GREIM: Videographer, can you catch</p> <p>22 the witness in a standing position? All right.</p> <p>23 BY MR. GREIM:</p> <p>24 Q. Okay. During the time that Strategic</p> <p>25 Vision was working on its project for you, did you 10:55</p> <p style="text-align: right;">Page 36</p>
<p>1 Guo Wengui</p> <p>2 say, Eddie?</p> <p>3 MR. GREIM: Yes.</p> <p>4 MR. HARMON: Okay. Thanks.</p> <p>5 MR. GREIM: Does -- does our 10:50</p> <p>6 interpreter agree with the check interpreter's</p> <p>7 statement that the witness actually said, "We need</p> <p>8 to bring them to be tried by the rule of law"?</p> <p>9 INTERPRETER: Yes, I agree.</p> <p>10 BY MR. GREIM: 10:51</p> <p>11 Q. Mr. Guo -- Mr. Guo, how do you intend</p> <p>12 to accomplish the goal that you just described to</p> <p>13 us? (DIR)</p> <p>14 MR. HARMON: Direct the witness not to</p> <p>15 answer. 10:51</p> <p>16 A. I'm not answering this question.</p> <p>17 BY MR. GREIM:</p> <p>18 Q. Was your work with Strategic Vision</p> <p>19 intended to accomplish the goal that you just</p> <p>20 described to us? 10:52</p> <p>21 A. Yes.</p> <p>22 Q. Is that what you told French Wallop and</p> <p>23 Mike Waller?</p> <p>24 A. Yes.</p> <p>25 Q. When did you tell them that? 10:52</p> <p style="text-align: right;">Page 35</p>	<p>1 Guo Wengui</p> <p>2 engage any other entity to perform the same</p> <p>3 services? (DIR)</p> <p>4 MR. GRENDI: Object to the form of the</p> <p>5 question -- 10:55</p> <p>6 MR. HARMON: Object to the form of the</p> <p>7 question and direct the witness not to answer.</p> <p>8 A. I refuse to answer.</p> <p>9 MR. GREIM: Counsel, is the basis for</p> <p>10 the objection that -- the argument is that it's 10:56</p> <p>11 irrelevant to the case?</p> <p>12 MR. HARMON: That's part of it. He is</p> <p>13 not a party to this action, so I -- I view efforts</p> <p>14 to obtain information about what he personally did 10:56</p> <p>15 outside of the relationship with Strategic Vision,</p> <p>16 Ms. Wallop, and Mr. Waller to be for the purpose</p> <p>17 of harassment, and direct him not to answer any of</p> <p>18 those questions.</p> <p>19 MR. GREIM: Our position is, that could</p> <p>20 be a merits argument, but that is an improper 10:56</p> <p>21 basis to instruct the witness not to answer. And</p> <p>22 I -- I'll make a record of these questions, and</p> <p>23 we'll bring it to the judge.</p> <p>24 MR. HARMON: I think that's what the</p> <p>25 judge invited us to do. 10:56</p> <p style="text-align: right;">Page 37</p>

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<p>1 Guo Wengui</p> <p>2 BY MR. GREIM:</p> <p>3 Q. Let me ask you this question: Where</p> <p>4 did you obtain the 15 names that you or Mrs. Wang</p> <p>5 gave to Strategic Vision to research? 10:57</p> <p>6 A. First of all, I need to tell you, I did</p> <p>7 not provide even one name.</p> <p>8 Q. Do you know who provided the 15 names</p> <p>9 to French Waller and Mike Wallop -- French Wallop</p> <p>10 and Mike Waller? 10:57</p> <p>11 A. Yvette.</p> <p>12 Q. Did you tell French Wallop and Mike</p> <p>13 Waller that you had paid over \$200 million for</p> <p>14 those names?</p> <p>15 INTERPRETER: You would pay, right? 10:58</p> <p>16 Not pay, but you would pay?</p> <p>17 MR. GREIM: You had paid.</p> <p>18 INTERPRETER: You had paid.</p> <p>19 CHECK INTERPRETER: Counsel, did you</p> <p>20 say 200 million? 10:58</p> <p>21 INTERPRETER: 200 million.</p> <p>22 A. It's a big lie. Never. It's a big,</p> <p>23 super lie.</p> <p>24 BY MR. GREIM:</p> <p>25 Q. Do you know how the 15 names were 10:58</p> <p style="text-align: right;">Page 38</p>	<p>1 Guo Wengui</p> <p>2 MR. HARMON: Object to the form of the</p> <p>3 question.</p> <p>4 A. So we're going to send these reports to</p> <p>5 the U.S. courts so that people who got persecuted 11:01</p> <p>6 would know the truth.</p> <p>7 BY MR. GREIM:</p> <p>8 Q. Mr. Guo, is -- do you know where</p> <p>9 Eastern Profit obtained the 15 names?</p> <p>10 A. No, I don't. 11:02</p> <p>11 Q. Did you approve the use -- strike that.</p> <p>12 Did you approve the 15 names before they</p> <p>13 were provided to Strategic Vision?</p> <p>14 MR. GRENDI: Object to the form.</p> <p>15 A. No. 11:02</p> <p>16 BY MR. GREIM:</p> <p>17 Q. Did you review the results of Strategic</p> <p>18 Vision's research?</p> <p>19 A. They never produced a report. All</p> <p>20 lies, zero. So all I got was a USB drive with 11:02</p> <p>21 Facebook posts and rumors gathered from the</p> <p>22 Internet. It's all lies. So I don't consider</p> <p>23 whatever they gather from Facebook can constitute</p> <p>24 as report. So, as a result, I never received a</p> <p>25 report. Very low, very despicable liars. 11:03</p> <p style="text-align: right;">Page 40</p>
<p>1 Guo Wengui</p> <p>2 obtained?</p> <p>3 A. No.</p> <p>4 Q. Who chose the 15 names?</p> <p>5 A. I don't know. 10:58</p> <p>6 Q. Do you know whether Yvette Wang chose</p> <p>7 the 15 names?</p> <p>8 A. I don't know.</p> <p>9 Q. What did you intend to do with the</p> <p>10 research that Strategic Vision was going to 10:59</p> <p>11 provide?</p> <p>12 MR. HARMON: Object to the form of the</p> <p>13 question.</p> <p>14 MR. GRENDI: Object to form.</p> <p>15 A. The simple reason is, we want to 10:59</p> <p>16 eliminate the Chinese Communist Party. We try to</p> <p>17 overthrow the Chinese Communist Party, to bring</p> <p>18 rule of law to China, to let the West know the</p> <p>19 scenes committed by the Chinese Communist Party.</p> <p>20 BY MR. GREIM: 11:00</p> <p>21 Q. My question was more specific.</p> <p>22 What did you intend to do with the</p> <p>23 research that Strategic Vision uncovered regarding</p> <p>24 the 15 names?</p> <p>25 MR. GRENDI: Object to the form. 11:00</p> <p style="text-align: right;">Page 39</p>	<p>1 Guo Wengui</p> <p>2 Q. Did you receive information on the same</p> <p>3 15 individuals from anyone else in 2018? (DIR)</p> <p>4 MR. HARMON: Direct the witness not to</p> <p>5 answer. 11:04</p> <p>6 A. I refuse to answer this question.</p> <p>7 BY MR. GREIM:</p> <p>8 Q. Did Eastern Profit receive information</p> <p>9 regarding the 15 individuals from any other source</p> <p>10 in 2018? 11:04</p> <p>11 A. I don't know.</p> <p>12 Q. Did Eastern Profit receive any</p> <p>13 information on the 15 individuals in 2017?</p> <p>14 A. I don't know.</p> <p>15 Q. Why did you expect to receive useful 11:05</p> <p>16 results regarding these 15 individuals?</p> <p>17 MR. HARMON: Object to the form of the</p> <p>18 question.</p> <p>19 MR. GRENDI: Object to the form of the</p> <p>20 question. 11:05</p> <p>21 INTERPRETER: Can you say that again,</p> <p>22 the question.</p> <p>23 BY MR. GREIM:</p> <p>24 Q. Why did you expect to receive useful</p> <p>25 results with respect to these 15 individuals? 11:05</p> <p style="text-align: right;">Page 41</p>

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<p>1 Guo Wengui</p> <p>2 INTERPRETER: So let me translate this</p> <p>3 question.</p> <p>4 A. So those two individuals claimed that</p> <p>5 they used to work for CIA, Pentagon, and FBI; and 11:06</p> <p>6 then they had, like, a lot of experience over the</p> <p>7 past many, many years. And they also boasted that</p> <p>8 they have a 24-hour working team based in the</p> <p>9 Middle East and Europe. And the lady claimed that</p> <p>10 she is so good at doing her job, and the gentleman 11:07</p> <p>11 also claimed that he is very good at doing the</p> <p>12 job. And they gave me a very, you know,</p> <p>13 convincing lying pitch about, you know, their</p> <p>14 ability. And, also, not to mention, you know, Han</p> <p>15 Lianchao, my contact, my liaison at the time -- 11:07</p> <p>16 these two individuals even showed my liaison, Han</p> <p>17 Lianchao, on their computers, you know, that, oh,</p> <p>18 we have discovered money laundering evidence that</p> <p>19 amounted to tens of -- of billions of dollars and</p> <p>20 hundreds of billions of dollars. And, also, Wang 11:07</p> <p>21 Qishan's daughter had a, you know, deposit -- lot</p> <p>22 of deposits with China Centric --</p> <p>23 CHECK INTERPRETER: CITIC Bank.</p> <p>24 A. Citibank, in China.</p> <p>25 CHECK INTERPRETER: CITIC. 11:07</p> <p style="text-align: right;">Page 42</p>	<p>1 Guo Wengui</p> <p>2 goddaughter of Wang Qishan had billions and</p> <p>3 hundreds of billions of deposits in China CITIC.</p> <p>4 And because of that, you know, Han Lianchao even</p> <p>5 gave a personal guarantee that, okay, I actually 11:10</p> <p>6 saw this information with my own eyes. However,</p> <p>7 we did not even -- we did not sign a contract even</p> <p>8 after that.</p> <p>9 And later on, Mr. Han Lianchao got</p> <p>10 summoned -- got asked by this lady again to come 11:10</p> <p>11 to apartment, also late at night, to look at the</p> <p>12 information again, to be given another pitch</p> <p>13 showing that, you know, tens of billions of</p> <p>14 dollars and hundreds of billions of dollars of</p> <p>15 deposits, you know, information in that regard. 11:10</p> <p>16 And we did not sign a contract.</p> <p>17 And so, with all those movements and</p> <p>18 activities, we were prodded to sign a contract as</p> <p>19 soon as possible. They say that once we sign the</p> <p>20 contract, they will be able to release that 11:10</p> <p>21 information to us. So, apparently, we got</p> <p>22 tricked, and we got tricked. And Han Lianchao, as</p> <p>23 a liaison in the middle, also got tricked.</p> <p>24 BY MR. GREIM:</p> <p>25 Q. Here is my question: What is it -- 11:11</p> <p style="text-align: right;">Page 44</p>
<p>1 Guo Wengui</p> <p>2 A. CITIC.</p> <p>3 INTERPRETER: CITIC, C-I-T-I-C.</p> <p>4 A. CITIC Bank, in China. So it was a very</p> <p>5 convincing pitch. 11:07</p> <p>6 CHECK INTERPRETER: And also, the</p> <p>7 witness also mentioned that if you don't sign the</p> <p>8 contract, you will not be able to obtain those</p> <p>9 information.</p> <p>10 INTERPRETER: I did not hear that part. 11:08</p> <p>11 CHECK INTERPRETER: (Speaking Chinese</p> <p>12 to witness.)</p> <p>13 A. So, yes, they prodded me to sign</p> <p>14 agreement as soon as possible so that they can</p> <p>15 give me the information about the goddaughter of 11:08</p> <p>16 Wang Qishan, her deposit in China CITIC, billions</p> <p>17 and billions of dollars. And, also, my liaison --</p> <p>18 Han Lianchao, even made a personal loan guarantee</p> <p>19 in order to sign the contract.</p> <p>20 So I'm not finished yet. 11:09</p> <p>21 I remember one night, late at night, this</p> <p>22 lady make emergency call, made a very urgent call</p> <p>23 to Han Lianchao asking Han Lianchao to come over</p> <p>24 to her apartment to show her something on the</p> <p>25 computer screen that says, you know, the 11:09</p> <p style="text-align: right;">Page 43</p>	<p>1 Guo Wengui</p> <p>2 start again.</p> <p>3 What was it about the 15 names that led</p> <p>4 you to believe that Strategic Vision's research</p> <p>5 would be useful to you in your goal of eliminating 11:11</p> <p>6 the Chinese Communist Party?</p> <p>7 MR. HARMON: Object to the form of the</p> <p>8 question.</p> <p>9 MR. GRENDI: Object to form.</p> <p>10 A. So the reason being, some of these 11:11</p> <p>11 names -- first of all, I don't know -- so I don't</p> <p>12 know all the names, but I do know -- I did know</p> <p>13 some of the names among the 15 names. Some names</p> <p>14 included, for example, the goddaughter of Wang</p> <p>15 Qishan, about -- you know, about her putting aside 11:13</p> <p>16 tens of billions of dollars and hundreds of</p> <p>17 billions of dollars in bank accounts. If we are</p> <p>18 able to disclose that information to the public,</p> <p>19 that would be great. And, also, they boasted that</p> <p>20 they had information, secret informations, about, 11:14</p> <p>21 you know, a police -- Chinese police department</p> <p>22 intelligence head, intelligence head, about his</p> <p>23 corruption information.</p> <p>24 So back then, we felt like, if -- with</p> <p>25 possession of those information, we are able to 11:14</p> <p style="text-align: right;">Page 45</p>

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<p>1 Guo Wengui</p> <p>2 release those information to the U.S. government</p> <p>3 to help save millions of peoples who got falsely</p> <p>4 persecuted in China, even hundreds of millions of</p> <p>5 people who got persecuted in China. And because 11:14</p> <p>6 of this lying pitch, we lost a wonderful</p> <p>7 opportunity to rescue all these millions and tens</p> <p>8 of millions of people who got thrown into jail for</p> <p>9 no reason.</p> <p>10 So, essentially, these two people, these 11:14</p> <p>11 two individuals, took advantage of our sense of</p> <p>12 urgency to rescue millions, tens of millions of</p> <p>13 people, from the prison, and they used those</p> <p>14 people as bait to try to get us into sign the</p> <p>15 contracts. And those two people -- those two 11:14</p> <p>16 individuals are really despicable and very low.</p> <p>17 CHECK INTERPRETER: The check</p> <p>18 interpreter wanted to raise one question with the</p> <p>19 actual interpreter to see whether he can agree to</p> <p>20 that. I don't believe that the witness said, "I 11:15</p> <p>21 know some of the names amongst those 15 names." I</p> <p>22 think that he said, I don't know those 15 names,</p> <p>23 but I know the names of just Wang Qishan</p> <p>24 goddaughter, Wang Qishan head of the intelligence.</p> <p>25 So if I -- those are the people that -- you know, 11:15</p> <p style="text-align: right;">Page 46</p>	<p>1 Guo Wengui</p> <p>2 some of the 15 names before they were given to</p> <p>3 Strategic Vision?</p> <p>4 A. Yes.</p> <p>5 MR. GREIM: I also want to be clear 11:17</p> <p>6 about something in the translation just now. A</p> <p>7 comment by the witness was -- in the transcript</p> <p>8 appears as "lying pitch," referring to someone.</p> <p>9 BY MR. GREIM:</p> <p>10 Q. Was that actually "lying bitch"? 11:17</p> <p>11 A. No.</p> <p>12 INTERPRETER: No, he did not use that.</p> <p>13 A. I'm not as despicable as the other</p> <p>14 party. I did not use "bitch." "Pitch," I said.</p> <p>15 VIDEOGRAPHER: The time is 11:18</p> <p>16 approximately 11:17 a.m., Friday, August 2, 2019.</p> <p>17 This is the end of media number 1 of the</p> <p>18 videotaped deposition of Mr. Guo Wengui. We are</p> <p>19 off the record.</p> <p>20 (Recess taken.) 11:18</p> <p>21 VIDEOGRAPHER: The time is</p> <p>22 approximately 11:36 a.m., Friday, August 2, 2019.</p> <p>23 This is media number 2 of the videotaped</p> <p>24 deposition of Mr. Guo Wengui. We are back on the</p> <p>25 record. 11:37</p> <p style="text-align: right;">Page 48</p>
<p>1 Guo Wengui</p> <p>2 something like that. I don't think that he said,</p> <p>3 actually, I know the names among the 15 names.</p> <p>4 Did you hear that?</p> <p>5 INTERPRETER: I think I heard that. 11:15</p> <p>6 And -- so what's the procedure?</p> <p>7 MR. GREIM: Why don't we do this: Let</p> <p>8 me just ask the witness that as a separate</p> <p>9 question, and we'll get an answer. And we'll ask</p> <p>10 only that question and ask for -- just for an 11:15</p> <p>11 answer to that part, so that -- and it's hard to</p> <p>12 translate, you know, paragraphs and paragraphs at</p> <p>13 a time.</p> <p>14 BY MR. GREIM:</p> <p>15 Q. So here's my question. 11:16</p> <p>16 MR. HARMON: Translate that first, and</p> <p>17 then ask the question.</p> <p>18 MR. GREIM: Okay.</p> <p>19 VIDEOGRAPHER: Counsel --</p> <p>20 MR. GREIM: Okay. Let's -- 11:16</p> <p>21 VIDEOGRAPHER: -- you have two minutes.</p> <p>22 MR. GREIM: Let's do that. Let's</p> <p>23 translate it and get an answer.</p> <p>24 BY MR. GREIM:</p> <p>25 Q. So here's my question: Did you know 11:16</p> <p style="text-align: right;">Page 47</p>	<p>1 Guo Wengui</p> <p>2 CONTINUED EXAMINATION</p> <p>3 BY MR. GREIM:</p> <p>4 Q. Mr. Guo, I want to follow up on a few</p> <p>5 questions from before our break. 11:37</p> <p>6 I believe I heard you say that Lianchao</p> <p>7 Han had extended a personal loan guarantee; is</p> <p>8 that correct?</p> <p>9 MR. HARMON: Object to the form of the</p> <p>10 question. 11:37</p> <p>11 MR. GREIM: Object to the form of the</p> <p>12 question.</p> <p>13 A. I think the lawyer is trying to bait</p> <p>14 me.</p> <p>15 CHECK INTERPRETER: No. I think he 11:38</p> <p>16 said "cited me wrongly."</p> <p>17 A. Cite me wrongly.</p> <p>18 What I said was, Mr. Han Lianchao told me</p> <p>19 that, "I saw the information with my own eyes, and</p> <p>20 I can personally guarantee that they have the 11:38</p> <p>21 ability to perform the job."</p> <p>22 So no money was involved.</p> <p>23 BY MR. GREIM:</p> <p>24 Q. And does all of the information you</p> <p>25 have about Ms. Wallop's interaction with Lianchao 11:38</p> <p style="text-align: right;">Page 49</p>

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<p>1 Guo Wengui</p> <p>2 Han come from Mr. Han's statements to you?</p> <p>3 A. I need to listen to the question one</p> <p>4 more time. I did not hear it clearly.</p> <p>5 MR. GREIM: I think I will just ask the 11:39</p> <p>6 translator to just repeat it.</p> <p>7 MR. HARMON: I think you'd probably be</p> <p>8 better off rephrasing it. It's a difficult</p> <p>9 question to follow. If you can.</p> <p>10 MR. GREIM: Okay. 11:39</p> <p>11 MR. HARMON: Thank you.</p> <p>12 BY MR. GREIM:</p> <p>13 Q. You testified earlier about several</p> <p>14 interactions between Ms. Wallop and Mr. Lianchao</p> <p>15 Han. 11:39</p> <p>16 Do you recall that testimony?</p> <p>17 A. Yes.</p> <p>18 Q. And does the information you conveyed</p> <p>19 to us come to you from Mr. Lianchao Han?</p> <p>20 A. Yes. 11:40</p> <p>21 Q. In a meeting in your apartment, did you</p> <p>22 show French Wallop and Mike Waller the 15 names on</p> <p>23 paper?</p> <p>24 A. No.</p> <p>25 Q. Did you explain to French Wallop and 11:41</p> <p style="text-align: right;">Page 50</p>	<p>1 Guo Wengui</p> <p>2 information to be disclosed to CNN or Wall Street</p> <p>3 Journal to try to confuse the public.</p> <p>4 Q. Were you present when the 15 names --</p> <p>5 let me strike that. 11:43</p> <p>6 Were you present when Yvette Wang</p> <p>7 discussed the 15 names with French Wallop or Mike</p> <p>8 Waller?</p> <p>9 MR. HARMON: Object to the form of the</p> <p>10 question. 11:43</p> <p>11 A. No.</p> <p>12 BY MR. GREIM:</p> <p>13 Q. I'm handing you an exhibit which we</p> <p>14 marked as Exhibit 12 in the deposition of Yvette</p> <p>15 Wang and Eastern Profit. 11:45</p> <p>16 (Exhibit 12, document indexed</p> <p>17 SVUS000171 through SVUS000259, previously</p> <p>18 marked for identification.)</p> <p>19 MR. HARMON: Do you have a copy of that</p> <p>20 for me? 11:45</p> <p>21 MR. GREIM: I'm sorry (handing).</p> <p>22 A. So all these 15 names here</p> <p>23 (indicating)?</p> <p>24 MR. HARMON: No question.</p> <p>25 BY MR. GREIM: 11:45</p> <p style="text-align: right;">Page 52</p>
<p>1 Guo Wengui</p> <p>2 Mike Waller the color coding on the paper</p> <p>3 printouts of the 15 names?</p> <p>4 MR. HARMON: Object to the form of the</p> <p>5 question. 11:41</p> <p>6 A. No.</p> <p>7 BY MR. GREIM:</p> <p>8 Q. Have you ever seen a paper printout of</p> <p>9 the 15 names?</p> <p>10 A. No. 11:41</p> <p>11 Q. Were you ever present for a discussion</p> <p>12 with French Wallop and Mike Waller about the</p> <p>13 15 names?</p> <p>14 A. So you mean my discussion with Frank</p> <p>15 and Mike, or discussion with whom? 11:42</p> <p>16 Q. With anyone when French Wallop and Mike</p> <p>17 Waller were present?</p> <p>18 A. So this question is too broad, too</p> <p>19 general. I cannot answer this question.</p> <p>20 Q. Have you ever discussed the 15 names in 11:42</p> <p>21 the presence of French Wallop and Mike Waller?</p> <p>22 A. No. Let me clarify one last time.</p> <p>23 I only discussed maybe one or two names,</p> <p>24 never all 15 names. So, please, do not set any</p> <p>25 trap for me. So I don't want all this fake 11:43</p> <p style="text-align: right;">Page 51</p>	<p>1 Guo Wengui</p> <p>2 Q. I haven't asked you a question yet,</p> <p>3 sir.</p> <p>4 You'll see that it's numbered from 1 to</p> <p>5 89, and the Bates number is -- 11:45</p> <p>6 MR. HARMON: When you say 1 to 89, I</p> <p>7 don't know --</p> <p>8 MR. GREIM: Oh. Okay.</p> <p>9 BY MR. GREIM:</p> <p>10 Q. And you'll see the Bates number is -- 11:46</p> <p>11 we'll call it an index number -- begins with</p> <p>12 SVUS000171 and ends with 259.</p> <p>13 A. What does the index mean?</p> <p>14 Q. That is a number that, in a lawsuit,</p> <p>15 lawyers put on a document so that we can keep 11:47</p> <p>16 track of them in the lawsuit.</p> <p>17 Have you seen this document before, sir?</p> <p>18 A. No.</p> <p>19 Q. Have you seen a document similar to</p> <p>20 this? 11:47</p> <p>21 A. I don't understand the standard for</p> <p>22 "similar."</p> <p>23 Q. Of similar length, involving the</p> <p>24 15 names.</p> <p>25 A. I can't answer this question regarding 11:47</p> <p style="text-align: right;">Page 53</p>

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<p>1 Guo Wengui</p> <p>2 "similar." In a legal sense, there is only "yes"</p> <p>3 or "no."</p> <p>4 Q. Mr. Guo, did you hold in your hands a</p> <p>5 document similar to Wang Exhibit 12 and toss it on 11:48</p> <p>6 the table in your apartment in front of Mr. Waller</p> <p>7 and Ms. Wallop?</p> <p>8 MR. HARMON: Object to the form of the</p> <p>9 question.</p> <p>10 MR. GRENDI: Object to the form of the 11:48</p> <p>11 question.</p> <p>12 A. I think you're telling a fiction.</p> <p>13 Never happened.</p> <p>14 BY MR. GREIM:</p> <p>15 Q. Have you seen a color version of this 11:49</p> <p>16 document?</p> <p>17 A. No.</p> <p>18 Q. Who compiled this document?</p> <p>19 A. I don't know.</p> <p>20 Q. Please look at the picture on page 2. 11:49</p> <p>21 Have you seen this picture before?</p> <p>22 A. Yes. It's all over the Internet. Yes,</p> <p>23 I've seen it many times. The source is not us.</p> <p>24 The source is somebody else, the source of this</p> <p>25 picture. It's all over the Internet, all over the 11:49</p> <p style="text-align: right;">Page 54</p>	<p>1 Guo Wengui</p> <p>2 A. I don't know.</p> <p>3 Q. And you are certain you have never seen</p> <p>4 this document before?</p> <p>5 A. You mean, this -- I haven't reviewed 11:52</p> <p>6 each page, so I can tell you -- I cannot tell you</p> <p>7 for sure. You did not give me the time -- enough</p> <p>8 time to go through each page, so -- there are</p> <p>9 89 pages in here. I haven't had a chance to</p> <p>10 review each page of them, so I cannot give you a 11:52</p> <p>11 yes-or-no answer. That would be irresponsible.</p> <p>12 Q. Very well. I will ask you to take a</p> <p>13 look at this on a break, and we'll come back and</p> <p>14 ask you the question later.</p> <p>15 MR. HARMON: I would like a 11:53</p> <p>16 clarification before we do that.</p> <p>17 Are you asking whether -- are you asking</p> <p>18 now, or are you -- will you be asking later,</p> <p>19 whether there are any pages of this that he has</p> <p>20 seen, or whether he has seen the entire document 11:53</p> <p>21 together?</p> <p>22 MR. GREIM: I think the question was</p> <p>23 clear, that I'm asking about whether he has seen</p> <p>24 this together --</p> <p>25 MR. HARMON: Together. 11:53</p> <p style="text-align: right;">Page 56</p>
<p>1 Guo Wengui</p> <p>2 world. This picture -- so this picture was</p> <p>3 released in 2017. It's been all over the</p> <p>4 Internet, all over the world. It's about some</p> <p>5 public figures, public individuals, and some 11:50</p> <p>6 public pictures. Just like Western public figures</p> <p>7 and public pictures, you can see it anywhere.</p> <p>8 Q. What do you mean by "puppet"?</p> <p>9 MR. HARMON: Public.</p> <p>10 MR. GREIM: Public. 11:50</p> <p>11 BY MR. GREIM:</p> <p>12 Q. Have you posted this on the Internet?</p> <p>13 A. This is part of public information.</p> <p>14 It's just as if somebody is using public</p> <p>15 information to try to cheat us. 11:51</p> <p>16 Q. Is this document, Wang Exhibit 12, the</p> <p>17 material Eastern Profit gave to Strategic Vision</p> <p>18 so that Strategic Vision could start its research?</p> <p>19 INTERPRETER: Sorry. Can you say that</p> <p>20 again, the question? 11:51</p> <p>21 BY MR. GREIM:</p> <p>22 Q. Is this document, Wang Exhibit 12, the</p> <p>23 information that Eastern Profit gave to Strategic</p> <p>24 Vision so that Strategic Vision could start its</p> <p>25 research? 11:51</p> <p style="text-align: right;">Page 55</p>	<p>1 Guo Wengui</p> <p>2 MR. GREIM: -- as an 89-page document,</p> <p>3 you know, with sections numbered 1 through 15,</p> <p>4 with names, followed by information with each</p> <p>5 name. 11:53</p> <p>6 MR. HARMON: Maybe -- maybe we can</p> <p>7 clarify that, because, clearly, he's saying he's</p> <p>8 seen the second page on the Internet.</p> <p>9 MR. GREIM: Well, I think -- I think</p> <p>10 the witness's testimony -- 11:53</p> <p>11 BY MR. GREIM:</p> <p>12 Q. Go ahead.</p> <p>13 A. I've never seen this document as a</p> <p>14 whole before.</p> <p>15 Q. And you were never present when this 11:54</p> <p>16 document was given to French Wallop and -- I'm</p> <p>17 sorry.</p> <p>18 You were never present when this document</p> <p>19 was shown in paper form to French Wallop and Mike</p> <p>20 Waller? 11:54</p> <p>21 MR. HARMON: Object to the form of the</p> <p>22 question.</p> <p>23 A. The question is very strange, because I</p> <p>24 don't even know when this pack of documents were</p> <p>25 given to them, so it's hard for me to tell you 11:55</p> <p style="text-align: right;">Page 57</p>

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<p>1 Guo Wengui</p> <p>2 whether I was present or not, because I do not</p> <p>3 even know where this pack of documents were given,</p> <p>4 were provided.</p> <p>5 BY MR. GREIM: 11:55</p> <p>6 Q. Mr. Guo, when did you first meet Bill</p> <p>7 Gertz?</p> <p>8 A. I cannot recall exactly; maybe 2017.</p> <p>9 Q. How did you first meet him?</p> <p>10 A. He wanted to do an interview with me, 11:55</p> <p>11 and he sought me out through a friend of mine.</p> <p>12 Q. Who was that friend?</p> <p>13 A. Sasha Gong, from VOA, Voice of America.</p> <p>14 Q. Did Mr. Gertz write an article after</p> <p>15 the interview? 11:56</p> <p>16 A. Yes.</p> <p>17 Q. How long after the interview did the</p> <p>18 article appear?</p> <p>19 A. I can't recall.</p> <p>20 Q. Was it many months or just a few days 11:56</p> <p>21 or weeks?</p> <p>22 A. I can't recall. I don't know.</p> <p>23 Q. When did you first meet Lianchao Han?</p> <p>24 A. It was around August or September 2017.</p> <p>25 MR. GREIM: From this point forward, we 11:57</p> <p style="text-align: right;">Page 58</p>	<p>1 Guo Wengui</p> <p>2 A. May 2017.</p> <p>3 Q. Who is Yang Chen Lee?</p> <p>4 A. Founder of civil -- Civic Power, an</p> <p>5 organization with the goal to overthrow the 11:59</p> <p>6 Chinese Communist Party.</p> <p>7 Q. Do you find that organization -- (DIR)</p> <p>8 MR. HARMON: Don't answer the question.</p> <p>9 A. I refuse to answer that question.</p> <p>10 BY MR. GREIM: 11:59</p> <p>11 Q. How many meetings did you have with</p> <p>12 Mr. Gertz before his first article appeared?</p> <p>13 A. I can't recall.</p> <p>14 Q. Was it more than one?</p> <p>15 A. I don't recall. I can't recall. 12:00</p> <p>16 Q. Has Gertz received any payment from you</p> <p>17 in the last two years? (DIR)</p> <p>18 MR. HARMON: Don't answer -- direct the</p> <p>19 witness not to answer.</p> <p>20 A. I refuse to answer this question. 12:00</p> <p>21 BY MR. GREIM:</p> <p>22 Q. Did Gertz introduce you to Strategic</p> <p>23 Vision?</p> <p>24 A. Yes.</p> <p>25 Q. Did he receive any payment for 12:00</p> <p style="text-align: right;">Page 60</p>
<p>1 Guo Wengui</p> <p>2 will call him Lianchao Han, L-i-a-n-c-h-a-o H-a-n.</p> <p>3 BY MR. GREIM:</p> <p>4 Q. How did you meet Lianchao Han?</p> <p>5 A. A partner at a organization called 11:57</p> <p>6 Civic Power, also an organization that's -- with</p> <p>7 the goal to overthrow the Chinese Communist Party.</p> <p>8 So I was introduced to Mr. Han by this partner</p> <p>9 from this civic organization.</p> <p>10 CHECK INTERPRETER: The witness said 11:58</p> <p>11 "citizen"?</p> <p>12 INTERPRETER: "Civic." "Civic Power."</p> <p>13 Citizen or civic; I think it's the same sort of</p> <p>14 thing.</p> <p>15 MR. GREIM: I don't think this is 11:58</p> <p>16 something we need to resolve.</p> <p>17 CHECK INTERPRETER: No.</p> <p>18 MR. HARMON: Another point of</p> <p>19 agreement.</p> <p>20 BY MR. GREIM: 11:58</p> <p>21 Q. I would like to hear again the name of</p> <p>22 the person who introduced you, however.</p> <p>23 Could you please restate that.</p> <p>24 A. Yang Chen Lee.</p> <p>25 Q. When did you first meet Yang Chen Lee? 11:59</p> <p style="text-align: right;">Page 59</p>	<p>1 Guo Wengui</p> <p>2 introducing you to Strategic Vision?</p> <p>3 A. No.</p> <p>4 Q. Has Mr. Gertz been appointed to serve</p> <p>5 on any organization of which you're a member? 12:01</p> <p>6 (DIR)</p> <p>7 MR. HARMON: Direct the witness not to</p> <p>8 answer.</p> <p>9 A. I refuse to answer this question.</p> <p>10 BY MR. GREIM: 12:01</p> <p>11 Q. Do you know the answer to the question?</p> <p>12 MR. HARMON: Just "yes" or "no."</p> <p>13 A. Yes.</p> <p>14 BY MR. GREIM:</p> <p>15 Q. Do you know the answer to the question 12:01</p> <p>16 about whether Mr. Gertz has received any payment</p> <p>17 from you or any organization you control?</p> <p>18 MR. HARMON: Object to the form of the</p> <p>19 question. The witness may answer "yes" or "no."</p> <p>20 A. No. 12:02</p> <p>21 BY MR. GREIM:</p> <p>22 Q. I'm sorry. You don't know whether --</p> <p>23 you don't know the answer to whether Mr. Gertz has</p> <p>24 received payment -- I'll break this apart.</p> <p>25 You don't know the answer to the question 12:02</p> <p style="text-align: right;">Page 61</p>

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<p>1 Guo Wengui</p> <p>2 of whether Mr. Gertz has received any payment from</p> <p>3 you?</p> <p>4 MR. HARMON: That's not what he said.</p> <p>5 So you can ask him, yes or no, does he know 12:02</p> <p>6 whether he gave a payment to Mr. Gertz.</p> <p>7 MR. GREIM: That's what I just did.</p> <p>8 That's what I just said.</p> <p>9 MR. HARMON: No. I'm sorry. I don't</p> <p>10 think that's what the question was. That's why 12:03</p> <p>11 I -- that's why I stepped in.</p> <p>12 BY MR. GREIM:</p> <p>13 Q. Mr. Guo, do you know the answer to the</p> <p>14 question of Mr. -- of whether Mr. Gertz has</p> <p>15 received any payment from you? 12:03</p> <p>16 A. Yes, I know the answer.</p> <p>17 Q. And do you know the answer to the</p> <p>18 question of whether Mr. Gertz has received payment</p> <p>19 from any entity which you control?</p> <p>20 MR. HARMON: Object to the form of that 12:03</p> <p>21 question.</p> <p>22 A. Yes, I know the answer.</p> <p>23 BY MR. GREIM:</p> <p>24 Q. Are you and Mr. Gertz both members of</p> <p>25 any of the same organizations? (DIR) 12:04</p> <p style="text-align: right;">Page 62</p>	<p>1 Guo Wengui</p> <p>2 Mr. Gertz?</p> <p>3 A. No. It doesn't worth my time to talk</p> <p>4 about this, to discuss this. 12:06</p> <p>5 Q. When did you last talk to Mr. Gertz?</p> <p>6 A. One week ago.</p> <p>7 Q. When did you last talk to Mr. Gertz</p> <p>8 about Strategic Vision, French Wallop, or Mike</p> <p>9 Waller?</p> <p>10 A. Long time ago. So Gertz asked me to 12:06</p> <p>11 forget about these two individuals, because Gertz</p> <p>12 told me that it's all lies and it's not worth my</p> <p>13 time. And he apologized to me profusely.</p> <p>14 Q. When was that conversation?</p> <p>15 A. I forgot -- I forget. 12:07</p> <p>16 Q. Has it been days or weeks ago, or has</p> <p>17 it been months ago?</p> <p>18 A. Months ago.</p> <p>19 Q. What is the book that you are helping</p> <p>20 Mr. Gertz to write? (DIR) 12:07</p> <p>21 MR. HARMON: What is the what?</p> <p>22 MR. GREIM: Book.</p> <p>23 MR. HARMON: Object to the form of the</p> <p>24 question and direct the witness not to answer.</p> <p>25 A. I refuse to answer. 12:08</p> <p style="text-align: right;">Page 64</p>
<p>1 Guo Wengui</p> <p>2 MR. HARMON: Direct the witness not to</p> <p>3 answer.</p> <p>4 A. I refuse to answer this question.</p> <p>5 BY MR. GREIM: 12:04</p> <p>6 Q. Are you worried that Mr. Gertz is a</p> <p>7 witness in this case?</p> <p>8 MR. HARMON: Object to the form of the</p> <p>9 question.</p> <p>10 A. The two liars, they don't care about 12:05</p> <p>11 harming friends; they don't care about harming</p> <p>12 good people. For me, I only worry about truth,</p> <p>13 the truth coming out.</p> <p>14 MR. GREIM: I move to strike that as</p> <p>15 nonresponsive. 12:05</p> <p>16 BY MR. GREIM:</p> <p>17 Q. My question is, are you aware that</p> <p>18 Mr. Gertz is a witness in this case?</p> <p>19 MR. HARMON: Object to the form of the</p> <p>20 question. 12:05</p> <p>21 A. Yes.</p> <p>22 BY MR. GREIM:</p> <p>23 Q. Is Mr. Gertz advising you on this case?</p> <p>24 A. No.</p> <p>25 Q. Have you discussed this case with 12:05</p> <p style="text-align: right;">Page 63</p>	<p>1 Guo Wengui</p> <p>2 BY MR. GREIM:</p> <p>3 Q. Do you know the answer to that</p> <p>4 question?</p> <p>5 A. No, I don't know the answer. 12:08</p> <p>6 Q. Are you working on any projects with</p> <p>7 Mr. Gertz?</p> <p>8 MR. HARMON: Just "yes" or "no."</p> <p>9 A. No. 12:08</p> <p>10 BY MR. GREIM:</p> <p>11 Q. When is the last time you spoke with</p> <p>12 Lianchao Han about this case?</p> <p>13 A. Yesterday.</p> <p>14 Q. What did you discuss?</p> <p>15 A. I texted Lianchao to ask him, do you 12:09</p> <p>16 remember what time I met these two liars, because</p> <p>17 I could not recall the time.</p> <p>18 Q. What was his response?</p> <p>19 A. He texted me back with a rough time</p> <p>20 frame about when the meeting was. 12:09</p> <p>21 Q. What was that rough time frame?</p> <p>22 A. The end of 2017, between the end of</p> <p>23 2017 and February 2018.</p> <p>24 Q. Why did you decide to text Mr. Han with</p> <p>25 that question yesterday? 12:10</p> <p style="text-align: right;">Page 65</p>

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<p>1 Guo Wengui</p> <p>2 A. Because today is my deposition, so I</p> <p>3 wanted to figure out the timing, the time for the</p> <p>4 meeting.</p> <p>5 Q. What else did you do to prepare for 12:10</p> <p>6 your deposition today?</p> <p>7 A. No, nothing else.</p> <p>8 Q. Did you confer with Yvette Wang in</p> <p>9 preparation for your deposition today?</p> <p>10 A. No. 12:11</p> <p>11 Q. Have you read the transcript of Yvette</p> <p>12 Wang's deposition?</p> <p>13 A. No.</p> <p>14 Q. Have you read the transcript of</p> <p>15 Ms. Wallop's or Mr. Waller's depositions? 12:11</p> <p>16 A. No. I did not have time, and I did not</p> <p>17 want to ruin my mood by reading the transcripts.</p> <p>18 Q. Have you posted images or transcript</p> <p>19 sections from Ms. Wallop's or Mr. Waller's</p> <p>20 depositions on the Internet? 12:12</p> <p>21 A. No.</p> <p>22 Q. Has someone else done this at your</p> <p>23 direction?</p> <p>24 A. No.</p> <p>25 Q. You testified earlier -- well, let me 12:12</p> <p style="text-align: right;">Page 66</p>	<p>1 Guo Wengui</p> <p>2 is, Mr. Han drafted the contract, the agreement.</p> <p>3 BY MR. GREIM:</p> <p>4 Q. How do you know that?</p> <p>5 A. Mr. Han was cheated to buy drinks, to 12:16</p> <p>6 buy dinners for these two liars; and after all the</p> <p>7 entertainment, he went back to his hotel room and</p> <p>8 drafted the agreement.</p> <p>9 Q. Was -- is it your belief that Mr. Han</p> <p>10 was intoxicated when he drafted the agreement? 12:16</p> <p>11 A. No.</p> <p>12 Q. Are you aware of the law firm of Foley</p> <p>13 Hoag -- I'm sorry. I'll start again.</p> <p>14 Are you aware of the law firm of Foley</p> <p>15 Hoag providing advice from the drafting of the 12:17</p> <p>16 agreement?</p> <p>17 MR. HARMON: Object to the form of the</p> <p>18 question.</p> <p>19 A. I can't recall.</p> <p>20 BY MR. GREIM: 12:17</p> <p>21 Q. Has Foley Hoag served as your counsel</p> <p>22 in the last two years?</p> <p>23 A. No.</p> <p>24 Q. Have you paid Foley Hoag in the last</p> <p>25 two years? 12:17</p> <p style="text-align: right;">Page 68</p>
<p>1 Guo Wengui</p> <p>2 just ask you: Did Lianchao Han help to introduce</p> <p>3 you to Strategic Vision?</p> <p>4 A. Han got involved after Mr. Gertz made</p> <p>5 the introduction. 12:13</p> <p>6 Q. When did he get involved?</p> <p>7 A. I can't recall, precisely.</p> <p>8 Q. How long after Gertz's introduction did</p> <p>9 Mr. Han become involved?</p> <p>10 A. So what I remember was, Han was helping 12:14</p> <p>11 with translation during the first meeting between</p> <p>12 me and Mr. Gertz and the two liars.</p> <p>13 Q. And whenever you say "the two liars,"</p> <p>14 are you referring to Ms. Wallop and Mr. Waller?</p> <p>15 A. I don't even know their real names. I 12:14</p> <p>16 can't even recall their real names. All I recall</p> <p>17 was, they sat across from me on the other side of</p> <p>18 the desk.</p> <p>19 Q. So is it your testimony, then, that</p> <p>20 Lianchao Han's first involvement with this 12:14</p> <p>21 contract was his attendance at a meeting between</p> <p>22 you and French Wallop and Mike Waller?</p> <p>23 MR. GRENDI: Object to the form.</p> <p>24 A. I cannot be a hundred percent certain,</p> <p>25 but I think so. But what I can be certain about 12:15</p> <p style="text-align: right;">Page 67</p>	<p>1 Guo Wengui</p> <p>2 A. No.</p> <p>3 Q. When did you first see a draft of the</p> <p>4 contract?</p> <p>5 MR. HARMON: Object to the form of the 12:18</p> <p>6 question.</p> <p>7 A. I cannot recall.</p> <p>8 BY MR. GREIM:</p> <p>9 Q. When did you first discuss a draft of</p> <p>10 the contract with Mr. Han? 12:18</p> <p>11 MR. HARMON: Object to the form of the</p> <p>12 question.</p> <p>13 MR. GRENDI: Object to the form of the</p> <p>14 question.</p> <p>15 A. I don't know. 12:18</p> <p>16 BY MR. GREIM:</p> <p>17 Q. Did you discuss a draft of the contract</p> <p>18 with Mr. Han?</p> <p>19 A. I don't remember, because I don't</p> <p>20 understand English, so I don't know how you can 12:19</p> <p>21 make the assumption that I can discuss.</p> <p>22 Q. Did Mr. Han ever translate a draft of</p> <p>23 the contract for you?</p> <p>24 A. No.</p> <p>25 Q. Did Yvette Wang ever translate a draft 12:19</p> <p style="text-align: right;">Page 69</p>

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<p>1 Guo Wengui</p> <p>2 of the contract for you?</p> <p>3 A. I can't recall.</p> <p>4 Q. Did Mr. Han ever discuss the terms of</p> <p>5 the contract with you before it was signed? 12:20</p> <p>6 A. I cannot recall.</p> <p>7 Q. Did Ms. Wang ever discuss the terms of</p> <p>8 the contract with you before it was signed?</p> <p>9 A. No.</p> <p>10 Q. Did Mr. Han receive any payment from 12:20</p> <p>11 you for his services with respect to the contract?</p> <p>12 MR. GRENDI: Object to the form.</p> <p>13 A. Mr. Han? No.</p> <p>14 BY MR. GREIM:</p> <p>15 Q. Are you paying Mr. Lianchao Han right 12:21</p> <p>16 now? (DIR)</p> <p>17 MR. HARMON: Direct the witness not to</p> <p>18 answer.</p> <p>19 A. I refuse to answer.</p> <p>20 MR. GREIM: What was the comment he 12:21</p> <p>21 made before he refused?</p> <p>22 INTERPRETER: He said, "No."</p> <p>23 BY MR. GREIM:</p> <p>24 Q. Does Lianchao Han serve on any boards</p> <p>25 or commissions with you? 12:21</p> <p style="text-align: right;">Page 70</p>	<p>1 Guo Wengui</p> <p>2 Bill Gertz that you were looking for a company to</p> <p>3 do research?</p> <p>4 A. I don't remember. I can't recall.</p> <p>5 Q. Are there any documents that would help 12:24</p> <p>6 you remember?</p> <p>7 A. I don't know.</p> <p>8 Q. When did you decide that you wanted to</p> <p>9 engage in the type of research that Strategic</p> <p>10 Vision did in this case? 12:25</p> <p>11 MR. GRENDI: Object to the form of the</p> <p>12 question.</p> <p>13 MR. HARMON: Object to the form of the</p> <p>14 question.</p> <p>15 A. I don't remember. 12:25</p> <p>16 BY MR. GREIM:</p> <p>17 Q. Did there come a time in 2017 when you</p> <p>18 decided that you needed a company to do the kind</p> <p>19 of research that Strategic Vision did?</p> <p>20 MR. GRENDI: Object to the form of the 12:25</p> <p>21 question.</p> <p>22 MR. HARMON: Same.</p> <p>23 A. No.</p> <p>24 BY MR. GREIM:</p> <p>25 Q. Do you object to the disclosure of the 12:26</p> <p style="text-align: right;">Page 72</p>
<p>1 Guo Wengui</p> <p>2 A. No.</p> <p>3 Q. Have you ever given anything of value</p> <p>4 to Lianchao Han? (DIR)</p> <p>5 MR. HARMON: Direct the witness not to 12:22</p> <p>6 answer.</p> <p>7 A. I refuse to answer.</p> <p>8 BY MR. GREIM:</p> <p>9 Q. Have you ever given anything of value</p> <p>10 to Bill Gertz? (DIR) 12:22</p> <p>11 MR. HARMON: Direct the witness not to</p> <p>12 answer.</p> <p>13 A. I refuse to answer.</p> <p>14 MR. GREIM: I would like to ask for the 12:23</p> <p>15 production of Mr. Guo's text exchanges with</p> <p>16 Lianchao Han about this litigation or about the</p> <p>17 contract.</p> <p>18 MR. HARMON: We'll deal with that --</p> <p>19 give us a list at the end of the deposition of</p> <p>20 what it is that you want Mr. Guo to search for, 12:23</p> <p>21 and we'll deal with it after the deposition.</p> <p>22 MR. GREIM: Very good. Thank you.</p> <p>23 (REQ)</p> <p>24 BY MR. GREIM:</p> <p>25 Q. In 2017, did you tell Lianchao Han or 12:24</p> <p style="text-align: right;">Page 71</p>	<p>1 Guo Wengui</p> <p>2 15 names that were provided to Strategic Vision?</p> <p>3 MR. HARMON: Object to the form of the</p> <p>4 question.</p> <p>5 A. No. I didn't know, because I didn't 12:26</p> <p>6 even know all 15 names, what those names were, so</p> <p>7 I don't know. I didn't know.</p> <p>8 BY MR. GREIM:</p> <p>9 Q. My question is, do you object today to</p> <p>10 making the 15 names that were given to Strategic 12:26</p> <p>11 Vision public?</p> <p>12 MR. GRENDI: Object to the form of the</p> <p>13 question.</p> <p>14 A. I cannot say yes or no, because I don't</p> <p>15 even know what those names are, what those 12:27</p> <p>16 15 names are.</p> <p>17 BY MR. GREIM:</p> <p>18 Q. I'll ask you to take a look at Wang</p> <p>19 Exhibit 12.</p> <p>20 A. What page? 12:27</p> <p>21 Q. Let's start with page 1.</p> <p>22 You see there are a total of ten pages</p> <p>23 pertaining to Anita Yiu Suen?</p> <p>24 A. Um-hum.</p> <p>25 Q. Let me ask you now, since we've leafed 12:28</p> <p style="text-align: right;">Page 73</p>

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<p>1 Guo Wengui</p> <p>2 through them, do you believe you have seen any of</p> <p>3 these pages, other than the second page, before?</p> <p>4 MR. HARMON: You mean the first ten</p> <p>5 pages of the exhibit, right? 12:28</p> <p>6 MR. GREIM: Correct.</p> <p>7 A. It's all over the Internet. This is,</p> <p>8 like, public information.</p> <p>9 BY MR. GREIM:</p> <p>10 Q. In what way could research regarding 12:29</p> <p>11 Anita Yiu Suen be helpful --</p> <p>12 MR. GRENDI: Object to the form.</p> <p>13 BY MR. GREIM:</p> <p>14 Q. -- in achieving the goal you identified</p> <p>15 earlier today? 12:29</p> <p>16 MR. GRENDI: Same objection.</p> <p>17 CHECK INTERPRETER: (Speaking Chinese</p> <p>18 to Interpreter.)</p> <p>19 INTERPRETER: I don't think that's the</p> <p>20 question. 12:30</p> <p>21 CHECK INTERPRETER: No?</p> <p>22 INTERPRETER: So your question is, in</p> <p>23 what way -- in what way could research -- what</p> <p>24 kind of -- what kind of research outcome would</p> <p>25 help you achieve your goal, right? 12:30</p> <p style="text-align: right;">Page 74</p>	<p>1 Guo Wengui</p> <p>2 A. I don't know.</p> <p>3 BY MR. GREIM:</p> <p>4 Q. Let's turn to page 11. Page 11 says,</p> <p>5 "2. Qing Yao." 12:32</p> <p>6 A. Yao Qing.</p> <p>7 Q. All right. Yao Qing. And I have the</p> <p>8 same question for Yao Qing.</p> <p>9 Could financial forensic research and</p> <p>10 tracking research regarding Yao Qing assist you in 12:32</p> <p>11 accomplishing the mission that you identified</p> <p>12 earlier today?</p> <p>13 MR. GRENDI: Object to the form of the</p> <p>14 question.</p> <p>15 MR. HARMON: Object to the form. 12:32</p> <p>16 A. I don't know.</p> <p>17 BY MR. GREIM:</p> <p>18 Q. Did you know at one time and you have</p> <p>19 forgotten, or you simply never knew?</p> <p>20 MR. HARMON: Object to the form of the 12:33</p> <p>21 question.</p> <p>22 MR. GRENDI: Object to the form of the</p> <p>23 question.</p> <p>24 A. So I'm not quite sure I follow this</p> <p>25 question. 12:33</p> <p style="text-align: right;">Page 76</p>
<p>1 Guo Wengui</p> <p>2 CHECK INTERPRETER: Or, like, how is it</p> <p>3 that getting the information of Suen Yiu helpful</p> <p>4 to the goals of the mission? Is that right? Is</p> <p>5 that your question? 12:30</p> <p>6 MR. GREIM: Correct. Yeah.</p> <p>7 I'll do a better job with the question,</p> <p>8 because I believe this is on me and not on anybody</p> <p>9 else. So let me do this again. Okay.</p> <p>10 BY MR. GREIM: 12:30</p> <p>11 Q. In what way could research regarding</p> <p>12 Anita Yiu Suen assist you in accomplishing the</p> <p>13 mission you identified earlier today?</p> <p>14 MR. GRENDI: Objection to the form.</p> <p>15 A. I cannot answer the question. I don't 12:30</p> <p>16 know how to answer your question.</p> <p>17 BY MR. GREIM:</p> <p>18 Q. Well, could financial forensic research</p> <p>19 and tracking research regarding Anita Yiu Suen</p> <p>20 assist you in the mission you identified earlier 12:31</p> <p>21 today?</p> <p>22 MR. HARMON: Object to the form of the</p> <p>23 question.</p> <p>24 MR. GRENDI: Object to the form of the</p> <p>25 question. 12:31</p> <p style="text-align: right;">Page 75</p>	<p>1 Guo Wengui</p> <p>2 BY MR. GREIM:</p> <p>3 Q. So my question is, was there a time</p> <p>4 when you believed that research regarding Yao Qing</p> <p>5 could assist you? 12:33</p> <p>6 MR. GRENDI: Object to the form of the</p> <p>7 question.</p> <p>8 A. I cannot recall -- I mean, I cannot</p> <p>9 tell you, no, what I thought, what I think back in</p> <p>10 the days. I don't know how to answer that 12:33</p> <p>11 question.</p> <p>12 BY MR. GREIM:</p> <p>13 Q. So before Strategic Vision was asked to</p> <p>14 look into Yao Qing, did you make some decision</p> <p>15 that that research would be helpful? 12:34</p> <p>16 MR. GRENDI: Object to the form of the</p> <p>17 question.</p> <p>18 MR. HARMON: Object to the form of the</p> <p>19 question.</p> <p>20 A. No. 12:34</p> <p>21 BY MR. GREIM:</p> <p>22 Q. Who did?</p> <p>23 MR. HARMON: Object to the form of the</p> <p>24 question.</p> <p>25 MR. GRENDI: Object to the form of the 12:34</p> <p style="text-align: right;">Page 77</p>

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<p>1 Guo Wengui</p> <p>2 question.</p> <p>3 A. I don't know.</p> <p>4 BY MR. GREIM:</p> <p>5 Q. Where did the information on the flash 12:35</p> <p>6 drives that Yvette Wang gave to French Wallop come</p> <p>7 from?</p> <p>8 MR. HARMON: Object to the form of the</p> <p>9 question.</p> <p>10 MR. GRENDI: Object to the form of the 12:35</p> <p>11 question.</p> <p>12 INTERPRETER: Where did information on</p> <p>13 the flash drive come from?</p> <p>14 CHECK INTERPRETER: That Yvette gave</p> <p>15 to -- 12:35</p> <p>16 A. I don't know.</p> <p>17 BY MR. GREIM:</p> <p>18 Q. If you look at pages 11 through 14 of</p> <p>19 Exhibit 12, can you tell me whether you have seen</p> <p>20 these pages before? 12:36</p> <p>21 A. It's everywhere. It's all over the</p> <p>22 place. Yes, I've seen it very often. Information</p> <p>23 like this has been routinely broadcast by China</p> <p>24 Central television, because you can see the most</p> <p>25 powerful people from China on TV every day, the 12:36</p> <p style="text-align: right;">Page 78</p>	<p>1 Guo Wengui</p> <p>2 the decision to hire Strategic Vision?</p> <p>3 A. I don't know. I don't know who made</p> <p>4 decision.</p> <p>5 Q. Who at Eastern Profit, or on behalf of 12:38</p> <p>6 Eastern Profit, was involved in the decision to</p> <p>7 hire Strategic Vision?</p> <p>8 A. I don't know.</p> <p>9 Q. Was Yvette Wang involved in the</p> <p>10 decision about whether to hire Strategic Vision? 12:38</p> <p>11 A. I don't think she had the authority to</p> <p>12 make that decision.</p> <p>13 Q. Why not?</p> <p>14 MR. HARMON: Why doesn't he think that,</p> <p>15 or why didn't she? 12:39</p> <p>16 MR. GREIM: Why doesn't he think that?</p> <p>17 A. It's feeling. It's just my personal</p> <p>18 feeling, gut feeling. There's no reason.</p> <p>19 BY MR. GREIM:</p> <p>20 Q. What is it about Yvette Wang that makes 12:39</p> <p>21 you believe she did not have the authority?</p> <p>22 MR. HARMON: Object to the form of the</p> <p>23 question.</p> <p>24 MR. GRENDI: Object to the form of the</p> <p>25 question. 12:39</p> <p style="text-align: right;">Page 80</p>
<p>1 Guo Wengui</p> <p>2 wealthiest and most powerful people on TV every</p> <p>3 day.</p> <p>4 Q. Why was Strategic Vision hired?</p> <p>5 MR. GRENDI: Object to the form of the 12:36</p> <p>6 question.</p> <p>7 A. I don't know. It's not me who hired</p> <p>8 them.</p> <p>9 BY MR. GREIM:</p> <p>10 Q. Who participated in -- I'm sorry. 12:37</p> <p>11 A. I would not have hired a lying company</p> <p>12 like this.</p> <p>13 Q. Who made the decision to hire Strategic</p> <p>14 Vision?</p> <p>15 INTERPRETER: So he's saying that I 12:37</p> <p>16 suggest Dong Ling (phonetic) hired the company.</p> <p>17 So I would like to clarify what Dong Ling is.</p> <p>18 Do you know the English name of that</p> <p>19 company?</p> <p>20 CHECK INTERPRETER: Is it Eastern 12:37</p> <p>21 something?</p> <p>22 INTERPRETER: Is it Eastern Profit?</p> <p>23 A. Eastern Profit.</p> <p>24 BY MR. GREIM:</p> <p>25 Q. Who on behalf of Eastern Profit made 12:38</p> <p style="text-align: right;">Page 79</p>	<p>1 Guo Wengui</p> <p>2 A. She's too young, and she's very pretty,</p> <p>3 so I don't think she will be -- she will have that</p> <p>4 kind of power to make a decision like that.</p> <p>5 BY MR. GREIM: 12:40</p> <p>6 Q. What is it about her looks or her</p> <p>7 attractiveness that impacts her ability to make</p> <p>8 that decision?</p> <p>9 MR. HARMON: Object to the form of the</p> <p>10 question. 12:40</p> <p>11 A. I don't know. It's just a natural</p> <p>12 feeling of mine.</p> <p>13 BY MR. GREIM:</p> <p>14 Q. Have you ever heard the name Han Chin</p> <p>15 Guong (phonetic)? 12:40</p> <p>16 A. Yes.</p> <p>17 Q. Is he the person who is involved in</p> <p>18 choosing Strategic Vision for the contract?</p> <p>19 MR. HARMON: Object to the form of the</p> <p>20 question. 12:41</p> <p>21 MR. GRENDI: Object to the form of the</p> <p>22 question.</p> <p>23 A. I don't know.</p> <p>24 CHECK INTERPRETER: Counsel, your</p> <p>25 question was, was he the person who made the 12:41</p> <p style="text-align: right;">Page 81</p>

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<p>1 Guo Wengui</p> <p>2 decision?</p> <p>3 INTERPRETER: Involved.</p> <p>4 MR. GREIM: Involved.</p> <p>5 CHECK INTERPRETER: Okay. 12:41</p> <p>6 BY MR. GREIM:</p> <p>7 Q. How old is Ms. Wang, by the way?</p> <p>8 A. Ms. Wang, right? Ms. Wang. I don't</p> <p>9 know. I honestly don't know.</p> <p>10 Q. Does she work for you? 12:41</p> <p>11 A. No.</p> <p>12 Q. Who does she work for?</p> <p>13 A. We used to work together. We once</p> <p>14 worked together.</p> <p>15 Q. What do you mean by that? 12:42</p> <p>16 A. We worked in the same company, but she</p> <p>17 did not work for me.</p> <p>18 Q. What company was that?</p> <p>19 A. Beijing Pangu (phonetic) hire Nu Yer</p> <p>20 Chin Chen (phonetic). 12:42</p> <p>21 Q. Where does she work now?</p> <p>22 A. She's doing a lot of work. She's</p> <p>23 currently doing a lot of work to overthrow the</p> <p>24 Chinese government and to rescue herself from the</p> <p>25 Communist Party. 12:42</p> <p style="text-align: right;">Page 82</p>	<p>1 Guo Wengui</p> <p>2 Q. Have you ever heard of Golden Spring</p> <p>3 New York Limited?</p> <p>4 A. Yes, I've heard of it. 12:45</p> <p>5 Q. What is it?</p> <p>6 A. It's a family fund company in New York.</p> <p>7 Q. What do you mean by "family fund</p> <p>8 company"?</p> <p>9 A. I don't know.</p> <p>10 Q. Well, does it do work for a particular 12:45</p> <p>11 family?</p> <p>12 A. Now, I don't know.</p> <p>13 Q. Did it at one time?</p> <p>14 A. At one time, yes.</p> <p>15 Q. What family? 12:45</p> <p>16 A. Once, I was one of the families that</p> <p>17 they worked for, once.</p> <p>18 Q. The Guo family?</p> <p>19 A. Yes, the Guo family. Yes.</p> <p>20 Q. Did it work for other families at that 12:46</p> <p>21 same time?</p> <p>22 A. I don't know.</p> <p>23 Q. When is the last time you had contact</p> <p>24 with any officer or employee of Golden Spring New</p> <p>25 York Limited? 12:46</p> <p style="text-align: right;">Page 84</p>
<p>1 Guo Wengui</p> <p>2 Q. For whom does she work now?</p> <p>3 A. I don't know.</p> <p>4 Q. When did you last see her before today?</p> <p>5 A. I saw her yesterday. 12:43</p> <p>6 Q. Do you see her every day?</p> <p>7 A. No.</p> <p>8 Q. How often do you see her?</p> <p>9 A. I can't describe. I can't describe. I</p> <p>10 mean -- sometimes not once for a few months, 12:43</p> <p>11 sometimes a few times per week.</p> <p>12 Q. Where did you see her yesterday?</p> <p>13 A. At a fund company.</p> <p>14 Q. What company was that?</p> <p>15 A. It's a company located in New York. 12:43</p> <p>16 Q. What is the name of the company, sir?</p> <p>17 A. This company has many names, so I don't</p> <p>18 know exactly what the name is. I know one of the</p> <p>19 names is Rule of Law Fund.</p> <p>20 Q. Does she work there? 12:44</p> <p>21 A. Well, I don't know.</p> <p>22 Q. Does she work for a company called</p> <p>23 Golden Spring New York Limited?</p> <p>24 A. Limited, I don't know. I'm not quite</p> <p>25 sure. 12:44</p> <p style="text-align: right;">Page 83</p>	<p>1 Guo Wengui</p> <p>2 MR. HARMON: Object to the form of the</p> <p>3 question.</p> <p>4 A. I don't remember.</p> <p>5 BY MR. GREIM: 12:46</p> <p>6 Q. Can you identify the person sitting</p> <p>7 four people down at the table, wearing a nice blue</p> <p>8 suit and a tie?</p> <p>9 A. I call him a young guy, a young pal. I</p> <p>10 think I vaguely know his name, but -- his name, 12:47</p> <p>11 the English name.</p> <p>12 Q. What is his English name?</p> <p>13 A. I don't know.</p> <p>14 Q. Is he your attorney?</p> <p>15 A. No. 12:47</p> <p>16 MR. HARMON: Object to the form of the</p> <p>17 question.</p> <p>18 BY MR. GREIM:</p> <p>19 Q. Do you know why he's here?</p> <p>20 A. I don't know. 12:47</p> <p>21 Q. Is he general counsel for Golden Spring</p> <p>22 Limited New York -- I'm sorry. Let me just ask it</p> <p>23 again.</p> <p>24 Is he general counsel for Golden Spring</p> <p>25 New York Limited? 12:47</p> <p style="text-align: right;">Page 85</p>

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<p>1 Guo Wengui</p> <p>2 A. I don't know.</p> <p>3 Q. Well, when is the last time you spoke</p> <p>4 with him?</p> <p>5 INTERPRETER: You mean this gentleman 12:48</p> <p>6 (indicating)?</p> <p>7 MR. GREIM: Yes.</p> <p>8 A. One hour ago.</p> <p>9 BY MR. GREIM:</p> <p>10 Q. Did he give you legal advice? 12:48</p> <p>11 MR. HARMON: Object to the form of the</p> <p>12 question.</p> <p>13 A. No.</p> <p>14 BY MR. GREIM:</p> <p>15 Q. Did you ask for legal advice? 12:48</p> <p>16 MR. HARMON: An hour ago? Or ever?</p> <p>17 BY MR. GREIM:</p> <p>18 Q. An hour ago.</p> <p>19 A. No.</p> <p>20 Q. Mr. Guo, is he or is he not your 12:48</p> <p>21 attorney?</p> <p>22 MR. HARMON: Object to the form of the</p> <p>23 question.</p> <p>24 A. He's not my attorney.</p> <p>25 MR. GREIM: Well, that being the case, 12:49</p> <p style="text-align: right;">Page 86</p>	<p>1 Guo Wengui</p> <p>2 Mr. Guo. You asked, is he your attorney? And you</p> <p>3 may think -- you may think that that's a subtle</p> <p>4 difference or no difference at all, but I don't. 12:50</p> <p>5 And -- so I suggest that we finish up the last</p> <p>6 15 minutes, or 10 minutes, whatever we have left</p> <p>7 of this tape, and we can deal with it later. But</p> <p>8 let's make use of our time.</p> <p>9 MR. GREIM: Well, I will ask that</p> <p>10 question. 12:50</p> <p>11 BY MR. GREIM:</p> <p>12 Q. Did you understand what your attorney</p> <p>13 said just now?</p> <p>14 MR. HARMON: You want it to be</p> <p>15 translated? Then we should have everything I said 12:50</p> <p>16 translated for the witness.</p> <p>17 MR. GREIM: Let me do this. We</p> <p>18 won't -- I won't do it that way, because</p> <p>19 otherwise -- I don't think he -- let me -- I'll</p> <p>20 pose a question. 12:50</p> <p>21 MR. HARMON: No. We've had this</p> <p>22 discussion on the record. I want the witness to</p> <p>23 know exactly what was said on the record before we</p> <p>24 continue.</p> <p>25 INTERPRETER: I will try my best to 12:50</p> <p style="text-align: right;">Page 88</p>
<p>1 Guo Wengui</p> <p>2 I don't think that he can be here. He's not</p> <p>3 representing anyone at this -- in this proceeding.</p> <p>4 MR. HARMON: So we've been -- we've</p> <p>5 been at this now for two hours, two and a half 12:49</p> <p>6 hours, two hours and 40 minutes, and now you're</p> <p>7 getting to a question of who is here and why they</p> <p>8 are here? Let's finish up this session, and then</p> <p>9 we'll deal with those questions.</p> <p>10 MR. GREIM: Well, I -- 12:49</p> <p>11 MR. HARMON: You're asking him to</p> <p>12 leave?</p> <p>13 MR. GREIM: I --</p> <p>14 MR. HARMON: Are you asking him to</p> <p>15 leave? 12:49</p> <p>16 MR. GREIM: I'm going to ask him to</p> <p>17 leave if he's not actually representing someone</p> <p>18 here. It's an important point. I believed that,</p> <p>19 when we started, he represented Mr. Guo. Mr. Guo</p> <p>20 has now sworn under oath he does not. 12:49</p> <p>21 MR. HARMON: He did not say that. He</p> <p>22 said he's not his attorney, because that's the</p> <p>23 question you asked -- Is he your attorney? -- that</p> <p>24 was the question you asked. You didn't ask</p> <p>25 whether or not he provides legal advice to 12:49</p> <p style="text-align: right;">Page 87</p>	<p>1 Guo Wengui</p> <p>2 recall it. I did not write it down, but I recall</p> <p>3 most of it.</p> <p>4 (Interpreter interprets colloquy.)</p> <p>5 BY MR. GREIM: 12:50</p> <p>6 Q. Does this gentleman that we've been</p> <p>7 speaking about, with the blue suit and nice tie,</p> <p>8 provide you legal advice?</p> <p>9 A. I need it now. I need it now.</p> <p>10 Q. Let me rephrase. I don't think I 12:52</p> <p>11 understand your answer.</p> <p>12 Does this gentleman in the blue suit</p> <p>13 provide you legal advice?</p> <p>14 MR. GREIM: Object to the form.</p> <p>15 A. So you mean does he provide -- so I'm 12:53</p> <p>16 saying "does," meaning, are you talking about two</p> <p>17 hours ago, one hour ago, or at this moment?</p> <p>18 BY MR. GREIM:</p> <p>19 Q. How about has he ever?</p> <p>20 A. So I think your statement is highly 12:53</p> <p>21 irresponsible. I cannot answer this question.</p> <p>22 There is no way for me to answer this question,</p> <p>23 because this is not relevant to my deposition</p> <p>24 today. So I don't know how to answer this</p> <p>25 question. I think the reason I'm here today, the 12:53</p> <p style="text-align: right;">Page 89</p>

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<p>1 Guo Wengui</p> <p>2 reason I'm here today -- I feel like a lot of time</p> <p>3 is wasted, and I think you're playing a game</p> <p>4 regarding, you know, legality. And I think a lot</p> <p>5 of time is wasted, and I don't understand the 12:54</p> <p>6 relevance. Almost all the questions you ask are</p> <p>7 vague or ambiguous. I don't think you hold the</p> <p>8 legal system in high regard. I don't think you</p> <p>9 are respecting the legal system. I think you have</p> <p>10 been abusing me and trying to find faults with me, 12:54</p> <p>11 trying to look for troubles regarding me and --</p> <p>12 Q. Did you ask this gentleman in the blue</p> <p>13 suit to be here today?</p> <p>14 A. No.</p> <p>15 Q. Has Yvette Wang ever been employed by 12:55</p> <p>16 Golden Spring New York Limited?</p> <p>17 A. I don't know.</p> <p>18 MR. GRENDI: Eddie, can we do a</p> <p>19 two-minute break?</p> <p>20 MR. HARMON: You have four minutes left 12:55</p> <p>21 on your tape.</p> <p>22 MR. GRENDI: It's fine. Go ahead.</p> <p>23 BY MR. GREIM:</p> <p>24 Q. When did you last talk to Yvette Wang</p> <p>25 about this case? 12:56</p> <p style="text-align: right;">Page 90</p>	<p>1 Guo Wengui</p> <p>2 off the record. Thank you.</p> <p>3</p> <p>4 (Luncheon recess taken at 12:57 p.m.) 12:58</p> <p>5</p> <p>6 AFTERNOON SESSION</p> <p>7 VIDEOGRAPHER: Good afternoon. The</p> <p>8 time is approximately 1:55 p.m., Friday, August 2,</p> <p>9 2019. This is media number 3 of the videotaped 01:56</p> <p>10 deposition of Mr. Guo Wengui. We're back on the</p> <p>11 record.</p> <p>12 CONTINUED EXAMINATION</p> <p>13 BY MR. GREIM:</p> <p>14 Q. Mr. Guo, could you please pull in front</p> <p>15 of you Wang Exhibit 12. 01:56</p> <p>16 A. This is number 12?</p> <p>17 Q. Yes.</p> <p>18 Do you know William Wu, or a William Yu,</p> <p>19 in London?</p> <p>20 A. I know William Yu. 01:56</p> <p>21 Q. Who is he?</p> <p>22 A. Used to be a friend of mine and also a</p> <p>23 partner of mine.</p> <p>24 Q. A partner in what, sir?</p> <p>25 A. Not partner, but we cooperated. We had 01:57</p> <p style="text-align: right;">Page 92</p>
<p>1 Guo Wengui</p> <p>2 A. I really don't remember. I don't even</p> <p>3 recall I have ever talked to her about this case.</p> <p>4 Q. Mr. Guo, do you pay -- make any kind of</p> <p>5 a payment or provide funds to Golden Spring New 12:57</p> <p>6 York Limited?</p> <p>7 A. You mean me, personally?</p> <p>8 Q. Yes.</p> <p>9 A. No.</p> <p>10 Q. Does any entity that you control make 12:57</p> <p>11 any payments to Golden Spring New York Limited?</p> <p>12 A. No.</p> <p>13 Q. Did any members of your family make</p> <p>14 payments to Golden Spring New York Limited?</p> <p>15 MR. HARMON: Object to the form of the 12:57</p> <p>16 question.</p> <p>17 MR. GRENDI: Object to the form of the</p> <p>18 question.</p> <p>19 A. I don't know. I don't know.</p> <p>20 MR. GREIM: Let's go ahead and take our 12:58</p> <p>21 break.</p> <p>22 VIDEOGRAPHER: The time is</p> <p>23 approximately 12:57 p.m., Friday, August 2, 2019.</p> <p>24 This is the end of media number 2 of the</p> <p>25 videotaped deposition of Mr. Guo Wengui. We're 12:58</p> <p style="text-align: right;">Page 91</p>	<p>1 Guo Wengui</p> <p>2 some cooperation in the past.</p> <p>3 CHECK INTERPRETER: We worked together.</p> <p>4 We worked together.</p> <p>5 A. We worked together. 01:57</p> <p>6 BY MR. GREIM:</p> <p>7 Q. In what did you work together?</p> <p>8 A. Anti-Chinese Communist Party.</p> <p>9 Q. Was this -- was this as part of an</p> <p>10 organization, or did you just work alongside each 01:57</p> <p>11 other?</p> <p>12 A. No. It was cooperation. It was</p> <p>13 working together on a personal level.</p> <p>14 Q. So you did not both work for the same</p> <p>15 entity? 01:58</p> <p>16 A. I don't remember.</p> <p>17 Q. Well, when is the last time you talked</p> <p>18 to him?</p> <p>19 A. A few weeks ago.</p> <p>20 Q. Did you talk about this case? 01:58</p> <p>21 A. No.</p> <p>22 Q. If you could, turn to page 15 on</p> <p>23 Exhibit 12.</p> <p>24 What name do you see there, sir?</p> <p>25 A. In Chinese, Guan Jun. 01:59</p> <p style="text-align: right;">Page 93</p>

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<p>1 Guo Wengui</p> <p>2 Q. And do you see that the next three</p> <p>3 pages are all about Guan Jun?</p> <p>4 A. So you want me to go through the three</p> <p>5 pages? 01:59</p> <p>6 Q. Yes.</p> <p>7 A. So 16 -- page 16 and 17, only two</p> <p>8 pages.</p> <p>9 Q. Okay. What about page 18? Does that</p> <p>10 have to do with Guan Jun? 01:59</p> <p>11 A. I don't know. I don't know. Page 18,</p> <p>12 I don't know.</p> <p>13 Q. By the way, Mr. Guo, I noticed you</p> <p>14 outside of our conference room during the break;</p> <p>15 and I just wanted to ask you, did you have a 02:00</p> <p>16 chance to look through this exhibit during our</p> <p>17 lunch break?</p> <p>18 A. No.</p> <p>19 Q. Let me ask you, then, have you seen</p> <p>20 pages 15 through 18 before? 02:00</p> <p>21 A. Yes. It's everywhere on the Internet.</p> <p>22 Q. Do you have any objection to those</p> <p>23 pages being publicly disclosed in this case?</p> <p>24 MR. HARMON: Object to the form of the</p> <p>25 question. 02:00</p> <p style="text-align: right;">Page 94</p>	<p>1 Guo Wengui</p> <p>2 you mean by "role"?</p> <p>3 Q. Did you help to recommend any of the</p> <p>4 names for Strategic Vision to research? 02:03</p> <p>5 A. I don't remember.</p> <p>6 Q. If Ms. Wang testified that you did,</p> <p>7 would you disagree with her?</p> <p>8 MR. HARMON: Object to the form of the</p> <p>9 question.</p> <p>10 A. I don't answer a hypothetical question. 02:04</p> <p>11 I do not answer any "if" question.</p> <p>12 BY MR. GREIM:</p> <p>13 Q. Well, "if" questions can be answered in</p> <p>14 a case. And so I want you -- I want to -- I'm</p> <p>15 going to reask you and see what your answer is. 02:04</p> <p>16 If Ms. Wang testified that the names --</p> <p>17 the 15 names came from you, would you disagree</p> <p>18 with that?</p> <p>19 MR. GRENDI: Object to the form.</p> <p>20 MR. HARMON: So I object to the form of 02:04</p> <p>21 the question. And I would -- I would ask you,</p> <p>22 Mr. Greim, please not to give my client advice or</p> <p>23 directions about the law.</p> <p>24 The question was asked. I object to the</p> <p>25 form. He should answer the question, if he can. 02:04</p> <p style="text-align: right;">Page 96</p>
<p>1 Guo Wengui</p> <p>2 CHECK INTERPRETER: (Speaking Chinese.)</p> <p>3 A. So I don't understand the question.</p> <p>4 Can you say it one more time?</p> <p>5 BY MR. GREIM: 02:01</p> <p>6 Q. Do you have any objection to those</p> <p>7 pages being publicly disclosed in this case?</p> <p>8 MR. HARMON: Objection to the question.</p> <p>9 A. No objection. No objection.</p> <p>10 BY MR. GREIM: 02:01</p> <p>11 Q. Did you play any role, sir, in the</p> <p>12 selection of Guan Jun for Strategic Vision's</p> <p>13 research?</p> <p>14 A. I don't remember.</p> <p>15 BY MR. GREIM: 02:02</p> <p>16 Q. Is it possible that you did?</p> <p>17 MR. HARMON: Object to the form of the</p> <p>18 question.</p> <p>19 A. I can't answer a question about</p> <p>20 possibility, likelihood. I don't know. 02:02</p> <p>21 BY MR. GREIM:</p> <p>22 Q. Did you play any role in the selection</p> <p>23 of any of the 15 names that were given to</p> <p>24 Strategic Vision for research?</p> <p>25 A. What do you mean by "role"? What do 02:03</p> <p style="text-align: right;">Page 95</p>	<p>1 Guo Wengui</p> <p>2 A. There is no way for me to answer this</p> <p>3 question.</p> <p>4 BY MR. GREIM: 02:05</p> <p>5 Q. Did you give these names to Mrs. Wang?</p> <p>6 A. Let me tell you, because I don't even</p> <p>7 know what those 15 names are, so I cannot answer</p> <p>8 you "yes" or "no," because I really don't know</p> <p>9 what those 15 names are, you know, what names 02:06</p> <p>10 you're referring to regarding Ms. Wang. So I</p> <p>11 can't give you a yes-or-no answer, because I don't</p> <p>12 know the names.</p> <p>13 Q. Of the four names we've seen so far,</p> <p>14 did you give any of these to Mrs. Wang?</p> <p>15 A. All those four names, I recommended -- 02:06</p> <p>16 I make a recommendation on those all four names.</p> <p>17 I said that we should, you know, do some research</p> <p>18 on those four names.</p> <p>19 Q. Who did you tell this to?</p> <p>20 A. I told Ms. Wang. I suggested her put 02:06</p> <p>21 all these names into her list.</p> <p>22 Q. Are you referring to all 15 names or</p> <p>23 just the first four?</p> <p>24 MR. GRENDI: Objection to the form.</p> <p>25 A. Let me emphasize. I don't know all 02:07</p> <p style="text-align: right;">Page 97</p>

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<p>1 Guo Wengui</p> <p>2 15 names, what all those 15 names are. All I can</p> <p>3 answer is based on the four names that we already</p> <p>4 discussed.</p> <p>5 BY MR. GREIM: 02:07</p> <p>6 Q. Okay. Then, we will go through each of</p> <p>7 the names.</p> <p>8 A. Okay.</p> <p>9 Q. Please look at page -- pages 19 through</p> <p>10 25. 02:07</p> <p>11 A. Where's 19? 19 to 25. These two like</p> <p>12 1 and 7. So it looks like a 7. 19 to 25, that's</p> <p>13 why I repeat it.</p> <p>14 So you want to go through it one by one,</p> <p>15 page by page? 02:08</p> <p>16 Q. What name do you see on page 19, sir?</p> <p>17 A. Fu Weihua.</p> <p>18 Q. And is it apparent to you that pages 19</p> <p>19 through 25 all pertain to Fu Weihua?</p> <p>20 A. I'm only looking at page 19 right now. 02:09</p> <p>21 I cannot answer a question -- do you allow me to</p> <p>22 read through 19 and 25?</p> <p>23 Q. Yes.</p> <p>24 MR. HARMON: While the witness is doing</p> <p>25 that, several of the questions and answers leading 02:09</p> <p style="text-align: right;">Page 98</p>	<p>1 Guo Wengui</p> <p>2 BY MR. GREIM:</p> <p>3 Q. Who assembled pages 19 through 25?</p> <p>4 A. I don't know.</p> <p>5 Q. Do you have any objection to making 02:11</p> <p>6 public in this case pages 19 through 25?</p> <p>7 A. I don't know. I can't answer this</p> <p>8 question.</p> <p>9 Q. If you need to review the pages, please</p> <p>10 do, to answer it. 02:11</p> <p>11 A. I have no objection to the name of Fu</p> <p>12 Weihua; however, the remaining information, I</p> <p>13 don't know.</p> <p>14 Q. Please take a second to look at those</p> <p>15 other pages and tell me if you have an objection. 02:11</p> <p>16 A. (Witness reviews document.) Regarding</p> <p>17 the name, regarding the content, the following</p> <p>18 information, I have no objection.</p> <p>19 Q. Please turn to page 26.</p> <p>20 Whose name do you see there? 02:12</p> <p>21 A. Meng Haijing.</p> <p>22 Q. Do you know who that is?</p> <p>23 A. Yes.</p> <p>24 Q. Who is it?</p> <p>25 A. So she's the daughter of -- she's the 02:13</p> <p style="text-align: right;">Page 100</p>
<p>1 Guo Wengui</p> <p>2 up to these questions on page 19 of the exhibit</p> <p>3 said four individuals, but we've only been through</p> <p>4 three.</p> <p>5 MR. GREIM: Because at that point, we 02:09</p> <p>6 were on page 19.</p> <p>7 MR. HARMON: I'm not -- I'm just saying</p> <p>8 that we had only been through three people, even</p> <p>9 though the questions and answers had to do with</p> <p>10 four. 02:09</p> <p>11 MR. GREIM: It included this page, this</p> <p>12 number four. Now we're moving into --</p> <p>13 MR. HARMON: I'm not sure that that's</p> <p>14 so, but I just want it to be clear for the record.</p> <p>15 It will say what it says. 02:09</p> <p>16 A. I know this person. I make the</p> <p>17 recommendation of this person.</p> <p>18 BY MR. GREIM:</p> <p>19 Q. Thank you.</p> <p>20 Now, the pending question is, do pages 19 02:10</p> <p>21 through 25 appear to relate to Weihua Fu?</p> <p>22 MR. GREIM: Object to the form.</p> <p>23 A. I don't remember all those following</p> <p>24 pages, but I made the recommendation about Fu</p> <p>25 Weihua. 02:10</p> <p style="text-align: right;">Page 99</p>	<p>1 Guo Wengui</p> <p>2 daughter of a -- of intelligence head in China and</p> <p>3 also the secretary of China's political and legal</p> <p>4 commission.</p> <p>5 Q. If you could, you'll see that the next 02:13</p> <p>6 section starts on page 39. So I want to now ask</p> <p>7 you about pages 26 to 38.</p> <p>8 A. Thirty-eight. Page 38.</p> <p>9 Q. My -- my question will be, do you know</p> <p>10 who compiled these pages? 02:14</p> <p>11 A. It's all over the Internet.</p> <p>12 Q. Have you seen these pages before?</p> <p>13 A. I've seen content, this content, many,</p> <p>14 many times.</p> <p>15 Q. Do you have any objection to public 02:14</p> <p>16 disclosure of these pages in this litigation?</p> <p>17 A. I don't have any suggestion. I neither</p> <p>18 object nor endorse the disclosure of this</p> <p>19 information.</p> <p>20 Q. Did you recommend the name of Meng 02:15</p> <p>21 Haijing to Yvette Wang?</p> <p>22 MR. GREIM: Object to the form.</p> <p>23 Go ahead.</p> <p>24 A. I did not provide any names. All I did</p> <p>25 was to make the recommendation regarding who we 02:15</p> <p style="text-align: right;">Page 101</p>

26 (Pages 98 to 101)

Guo Wengui
August 2, 2019

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<p>1 Guo Wengui</p> <p>2 should research on. However, all this</p> <p>3 information, so far, information that we have</p> <p>4 covered so far, is easily available online.</p> <p>5 BY MR. GREIM: 02:16</p> <p>6 Q. My question -- and I understand, sir.</p> <p>7 My question is whether you made the</p> <p>8 recommendation for this name.</p> <p>9 MR. GRENDI: Objection.</p> <p>10 A. This one, I don't remember. 02:16</p> <p>11 BY MR. GREIM:</p> <p>12 Q. Is it possible that you did, though,</p> <p>13 and you just can't remember?</p> <p>14 MR. HARMON: Object to the form of the</p> <p>15 question. 02:16</p> <p>16 A. I don't answer any question that's</p> <p>17 uncertain or regarding possibility.</p> <p>18 CHECK INTERPRETER: Or "if."</p> <p>19 BY MR. GREIM:</p> <p>20 Q. Can you say definitively that you did 02:17</p> <p>21 not make this recommendation?</p> <p>22 A. I don't remember.</p> <p>23 Q. Please turn to page 39. And I'm now</p> <p>24 going to ask you about pages 39 to 41. Page 39</p> <p>25 has number 6. 02:17</p> <p style="text-align: right;">Page 102</p>	<p>1 Guo Wengui</p> <p>2 A. A hundred percent, I made that</p> <p>3 recommendation.</p> <p>4 Q. And did you expect that research into</p> <p>5 this person would aide you in the objective that 02:19</p> <p>6 you testified to earlier today?</p> <p>7 MR. GRENDI: Object to the form.</p> <p>8 MR. HARMON: Object to the form of the</p> <p>9 question.</p> <p>10 A. Yes. 02:20</p> <p>11 BY MR. GREIM:</p> <p>12 Q. And would you have any objection to the</p> <p>13 public disclosure in this litigation of pages 39</p> <p>14 through 41?</p> <p>15 A. I'm currently only on page 39. I 02:20</p> <p>16 haven't reviewed the other pages yet.</p> <p>17 Q. Please review the other pages.</p> <p>18 A. Thank you. Thank you for allowing me.</p> <p>19 (Witness reviews document.)</p> <p>20 Q. Now I will repeat my question. 02:21</p> <p>21 Do you have any objection to the public</p> <p>22 disclosure in this litigation of pages 39 through</p> <p>23 41?</p> <p>24 A. I object 100 percent. If you</p> <p>25 include -- if you disclose this information to the 02:21</p> <p style="text-align: right;">Page 104</p>
<p>1 Guo Wengui</p> <p>2 And what name, sir, do you see there?</p> <p>3 A. Sun Lijun.</p> <p>4 Q. Who is that person?</p> <p>5 A. So she's the number 2 head of the 02:18</p> <p>6 intelligence agency in China. She did a lot of --</p> <p>7 she persecuted a lot of innocent people in Tibet</p> <p>8 and in Xinjiang (phonetic). And also, a lot of my</p> <p>9 family members were arrested by him. And also,</p> <p>10 currently, he's in Hong Kong to persecute 02:18</p> <p>11 additional people, and he's also pursuing me in</p> <p>12 the U.S. He's currently the vice minister of</p> <p>13 China's public safety.</p> <p>14 Q. What do you mean when you say he is</p> <p>15 pursuing you in the U.S.? 02:18</p> <p>16 A. New York Times actually wrote an</p> <p>17 article about him being in the U.S.</p> <p>18 Q. I see.</p> <p>19 So are you saying that he came to the</p> <p>20 U.S. to pursue you? 02:19</p> <p>21 A. Yes.</p> <p>22 Q. When?</p> <p>23 A. 2017.</p> <p>24 Q. Did you recommend this name to Yvette</p> <p>25 Wang? 02:19</p> <p style="text-align: right;">Page 103</p>	<p>1 Guo Wengui</p> <p>2 public, hundreds of millions of people will get</p> <p>3 killed because of this, including -- you know, the</p> <p>4 family members of Wong Yen Ping have been killed,</p> <p>5 and a lot of other investigators who are engaged 02:22</p> <p>6 in investigating matters in this regard will get</p> <p>7 killed. So if they get killed, the blood will be</p> <p>8 on you, including me personally, including my</p> <p>9 family members in the U.S., and also family</p> <p>10 members of Wong Yen Ping and Wong Yen Ping 02:22</p> <p>11 herself. All of us will be under threat.</p> <p>12 Q. What other investigators are</p> <p>13 investigating number 6, Sun Lijun?</p> <p>14 A. I don't know. But it's just -- I</p> <p>15 assume that -- I mean, I assume that a lot of 02:22</p> <p>16 people are also engaged in trying to figure out</p> <p>17 his dealings. Those people, they will be</p> <p>18 threatened as well.</p> <p>19 So that's why I'm saying your clients,</p> <p>20 you know, they've been using, you know, this name 02:23</p> <p>21 as a bait, use this name as a bait, keep telling</p> <p>22 me, can we publicly disclose this name, publicly</p> <p>23 disclose this information? If we do that, a lot</p> <p>24 of people in the U.S. will get harmed and a lot of</p> <p>25 people in China will get killed. And your clients 02:23</p> <p style="text-align: right;">Page 105</p>

27 (Pages 102 to 105)

Guo Wengui
August 2, 2019

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<p>1 Guo Wengui</p> <p>2 keep using this name as bargaining chip in this</p> <p>3 process, about, you know, disclosing this name and</p> <p>4 relevant information.</p> <p>5 Q. I'm sorry. 02:24</p> <p>6 Have my clients been in contact with you</p> <p>7 about the disclosure of name number 6?</p> <p>8 A. You are the third lawyer on this case</p> <p>9 representing them. The previous two lawyers who</p> <p>10 got fired -- the previous two lawyers reached out 02:24</p> <p>11 to me, reached out to my camp about disclosing</p> <p>12 this name.</p> <p>13 CHECK INTERPRETER: Releasing --</p> <p>14 releasing the name.</p> <p>15 A. Releasing the name. 02:24</p> <p>16 BY MR. GREIM:</p> <p>17 Q. Well, what -- have you taken any</p> <p>18 measures to ensure that Eastern Profit does not</p> <p>19 disclose this name?</p> <p>20 MR. GRENDI: Objection to the form. 02:25</p> <p>21 A. No.</p> <p>22 BY MR. GREIM:</p> <p>23 Q. Why not?</p> <p>24 A. So it's their business. Why would I do</p> <p>25 this? It's their business. 02:25</p> <p style="text-align: right;">Page 106</p>	<p>1 Guo Wengui</p> <p>2 Eastern Profit?</p> <p>3 MR. GRENDI: Object to the form.</p> <p>4 You can answer.</p> <p>5 A. Sorry. I made a mistake. 02:27</p> <p>6 Of course, I was not worried.</p> <p>7 BY MR. GREIM:</p> <p>8 Q. Why not?</p> <p>9 A. Because all their families were</p> <p>10 persecuted in China and framed by the Chinese 02:28</p> <p>11 Communist Party. If they release that</p> <p>12 information, the family members will get killed.</p> <p>13 Of course, they did not have the incentive to</p> <p>14 release the information.</p> <p>15 Q. Which families are you referring to? 02:28</p> <p>16 A. Yen Ping, Yvette.</p> <p>17 Q. What does Yvette have to do with</p> <p>18 Eastern Profit?</p> <p>19 A. I don't know.</p> <p>20 Q. Well, then, how could you be sure that 02:28</p> <p>21 Yvette's personal concerns would protect you when</p> <p>22 you gave the information to Eastern Profit?</p> <p>23 MR. HARMON: Object to the form of the</p> <p>24 question.</p> <p>25 MR. GRENDI: Objection to the form. 02:28</p> <p style="text-align: right;">Page 108</p>
<p>1 Guo Wengui</p> <p>2 Q. What is their business?</p> <p>3 A. I do not refer to anything specific.</p> <p>4 Q. Do you know what the business of</p> <p>5 Eastern Profit is? 02:25</p> <p>6 A. I don't know.</p> <p>7 Q. Were you at all concerned that this</p> <p>8 information was given to Eastern Profit?</p> <p>9 A. Of course, I worry. Of course, I was</p> <p>10 worried, you know. We got cheated, and then, 02:26</p> <p>11 after we gave over the information, they colluded</p> <p>12 with the Chinese Communist Party and threatened us</p> <p>13 by saying that we're going to release this</p> <p>14 information. And the release of this information 02:26</p> <p>15 would cause millions of people die -- I mean</p> <p>16 harmed.</p> <p>17 Q. My question was with respect to Eastern</p> <p>18 Profit.</p> <p>19 Did you understand that?</p> <p>20 A. I know. I don't know what it's all 02:27</p> <p>21 about.</p> <p>22 You're talking about a research company,</p> <p>23 right?</p> <p>24 Q. Mr. Guo, my question was, were you at</p> <p>25 all concerned that this information was given to 02:27</p> <p style="text-align: right;">Page 107</p>	<p>1 Guo Wengui</p> <p>2 A. I have faith in her. I cannot</p> <p>3 speculate.</p> <p>4 BY MR. GREIM:</p> <p>5 Q. On what basis do you have faith in her? 02:29</p> <p>6 A. Because her family members were</p> <p>7 persecuted, persecuted and framed, and also</p> <p>8 herself was persecuted and framed.</p> <p>9 Q. Even if that is true, Mr. Guo, how can</p> <p>10 her own personal concerns affect Eastern Profit? 02:29</p> <p>11 MR. GRENDI: Object to the form.</p> <p>12 MR. HARMON: Object to the form of the</p> <p>13 question.</p> <p>14 A. I don't know.</p> <p>15 BY MR. GREIM: 02:29</p> <p>16 Q. Does Ms. Wang have any control over</p> <p>17 Eastern Profit?</p> <p>18 A. I don't know.</p> <p>19 Q. Are you aware of any families that have</p> <p>20 control over Eastern Profit? 02:30</p> <p>21 INTERPRETER: You mean her family?</p> <p>22 BY MR. GREIM:</p> <p>23 Q. Are you aware of any families that have</p> <p>24 any control over Eastern Profit?</p> <p>25 A. I don't know. 02:30</p> <p style="text-align: right;">Page 109</p>

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Guo Wengui
August 2, 2019

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<p>1 Guo Wengui</p> <p>2 Q. Do you know the identity of any officer</p> <p>3 or director of Eastern Profit?</p> <p>4 A. I don't know.</p> <p>5 Q. What's your daughter's name? (DIR) 02:30</p> <p>6 MR. HARMON: Direct the witness not to</p> <p>7 answer.</p> <p>8 A. I refuse to answer.</p> <p>9 BY MR. GREIM:</p> <p>10 Q. Is your daughter a director -- in fact, 02:30</p> <p>11 is your daughter the sole director of Eastern</p> <p>12 Profit?</p> <p>13 A. If you can guarantee that if we -- if I</p> <p>14 release this information and then she won't get</p> <p>15 killed, she won't get persecuted by the Chinese 02:31</p> <p>16 Communist Party, then I can tell you information.</p> <p>17 But can you guarantee that.</p> <p>18 CHECK INTERPRETER: And all that. So</p> <p>19 information today, if I tell you whatever, it's</p> <p>20 not going to be leaked. 02:31</p> <p>21 A. And also, the two clients, would they</p> <p>22 use this information as a way to threaten me?</p> <p>23 BY MR. GREIM:</p> <p>24 Q. Mr. Guo, are you aware that this</p> <p>25 information is available in public archives in 02:31</p> <p style="text-align: right;">Page 110</p>	<p>1 Guo Wengui</p> <p>2 confidential or whether it is otherwise public.</p> <p>3 And we'll talk with you at that time. And if we</p> <p>4 disagree, we will take it to the judge. But there</p> <p>5 is not a super protective order above and beyond 02:33</p> <p>6 the protective order that all the parties have</p> <p>7 entered into.</p> <p>8 MR. HARMON: I understand what you</p> <p>9 said. And in light of that, I'm going to say that</p> <p>10 the witness has provided you the only answer 02:33</p> <p>11 you're going to get on these questions today until</p> <p>12 his assurances can be met.</p> <p>13 MR. GREIM: All right. So are you</p> <p>14 instructing the witness not to answer the</p> <p>15 question? 02:33</p> <p>16 MR. HARMON: I think you've gotten the</p> <p>17 only answer from the witness that you're going to</p> <p>18 get. He's answered the question. He's answered</p> <p>19 the question by asking you to assure that the</p> <p>20 information will be -- not be leaked, that it will 02:33</p> <p>21 be subject to the confidentiality order and</p> <p>22 maintained as confidential. And if you can't</p> <p>23 provide that assurance, then we should move on to</p> <p>24 the next question.</p> <p>25 MR. GREIM: That is not what the 02:33</p> <p style="text-align: right;">Page 112</p>
<p>1 Guo Wengui</p> <p>2 Hong Kong?</p> <p>3 A. That, I don't know.</p> <p>4 Q. I'm going to ask you to answer the</p> <p>5 question. 02:32</p> <p>6 Is your daughter, or is she not, a</p> <p>7 director of Eastern Profit?</p> <p>8 MR. HARMON: Are you going to provide</p> <p>9 the guarantees that Mr. Guo has asked for?</p> <p>10 MR. GREIM: I'm not making any promises 02:32</p> <p>11 about leaks to the Communist Party. There is a</p> <p>12 protective order that covers this case, which</p> <p>13 governs us. It would protect this information</p> <p>14 like everything else. The witness cannot -- I'll</p> <p>15 leave it at that. 02:32</p> <p>16 MR. HARMON: So if he answers the</p> <p>17 question, then you agree that the information is</p> <p>18 subject to the confidentiality order and that</p> <p>19 nobody associated with this case will release the</p> <p>20 information. 02:32</p> <p>21 Is that what you're saying.</p> <p>22 MR. GREIM: I would ask you to make the</p> <p>23 designation within the first 21 days after the</p> <p>24 transcript is finalized, for the protective order.</p> <p>25 We will then consider whether this information is 02:32</p> <p style="text-align: right;">Page 111</p>	<p>1 Guo Wengui</p> <p>2 witness has asked me. The protective order</p> <p>3 governs this deposition. We are going to comply</p> <p>4 with the protective order. I'm not going to make</p> <p>5 promises that go beyond the protective order. 02:33</p> <p>6 MR. HARMON: I understand what you</p> <p>7 said. And what you said is that you leave open</p> <p>8 for yourself the right to seek to disseminate the</p> <p>9 information. That is anathema to the witness.</p> <p>10 He's made that clear. So he's not going to 02:34</p> <p>11 provide any further answers on this. Let's move</p> <p>12 on.</p> <p>13 INTERPRETER: So should I at least</p> <p>14 summarize?</p> <p>15 MR. GREIM: Go ahead. Summarize so the 02:34</p> <p>16 witness can hear all this.</p> <p>17 INTERPRETER: (Interpreter summarizes</p> <p>18 colloquy.)</p> <p>19 BY MR. GREIM:</p> <p>20 Q. Is Han Chunguang a director of Eastern 02:35</p> <p>21 Profit?</p> <p>22 A. Probably, but I can't be sure.</p> <p>23 Q. Why do you say "probably"?</p> <p>24 A. So he's independent of me. He's</p> <p>25 independent. Why would I know? Why would I know? 02:35</p> <p style="text-align: right;">Page 113</p>

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<p>1 Guo Wengui</p> <p>2 Q. Well, I'm asking you why you said</p> <p>3 "probably."</p> <p>4 A. It's a feeling. It's just a personal</p> <p>5 feeling. 02:36</p> <p>6 Q. Is that based on any public records,</p> <p>7 sir?</p> <p>8 A. I don't know.</p> <p>9 Q. When did you last talk to Han</p> <p>10 Chunguang? 02:36</p> <p>11 A. This morning.</p> <p>12 Q. Where did you see him?</p> <p>13 MR. HARMON: I'm sorry. He didn't say</p> <p>14 he saw him. He said he spoke to him.</p> <p>15 MR. GREIM: Let's see if he -- let's 02:36</p> <p>16 see if we can avoid it.</p> <p>17 BY MR. GREIM:</p> <p>18 Q. Did you see him in person?</p> <p>19 A. Yes.</p> <p>20 Q. Where did you see him? 02:36</p> <p>21 A. On his way to the company, we saw each</p> <p>22 other.</p> <p>23 Q. What company?</p> <p>24 A. Downstairs, on my apartment.</p> <p>25 Q. What company is downstairs of your 02:37</p> <p style="text-align: right;">Page 114</p>	<p>1 Guo Wengui</p> <p>2 A. I refuse to answer.</p> <p>3 MR. GREIM: On what basis can he not</p> <p>4 answer this questions? I'm very curious.</p> <p>5 MR. HARMON: What has this got to do 02:38</p> <p>6 with this case? What possible motive do you have</p> <p>7 for seeking this information? Don't answer my</p> <p>8 questions. You'll have your opportunity to</p> <p>9 explain that to the court, because I cannot fathom</p> <p>10 it, and I'm not permitting the deposition to go 02:38</p> <p>11 into the personal activities of my client. It's</p> <p>12 got nothing to do with what's going on here. And</p> <p>13 you've already -- you and your clients have</p> <p>14 already gone public with what your true motive</p> <p>15 here is in asking these questions. 02:39</p> <p>16 So I'm putting a line beyond which I will</p> <p>17 not let the witness answer. The judge has made it</p> <p>18 clear that, at some point, if you think that I'm</p> <p>19 overreaching, we can have a meet and confer and</p> <p>20 bring the matter to the attention of the court, 02:39</p> <p>21 and either the judge or the magistrate will</p> <p>22 resolve whether or not Mr. Guo has to answer these</p> <p>23 questions. But for today, this is my line. So</p> <p>24 let's try and use the rest of our time fruitfully.</p> <p>25 BY MR. GREIM: 02:40</p> <p style="text-align: right;">Page 116</p>
<p>1 Guo Wengui</p> <p>2 apartment?</p> <p>3 A. Yes, downstairs of my apartment.</p> <p>4 Q. Okay. And what company is downstairs</p> <p>5 of your apartment? 02:37</p> <p>6 MR. HARMON: Objection to the form of</p> <p>7 the question.</p> <p>8 A. I made a mistake. I correct myself.</p> <p>9 It's not company. It's my apartment.</p> <p>10 BY MR. GREIM: 02:37</p> <p>11 Q. Why would Mr. Chunguang be going to</p> <p>12 your apartment?</p> <p>13 A. Let me repeat. Downstairs of my</p> <p>14 apartment building. It's not my home. It's not</p> <p>15 my apartment. It's a hotel. It's a public lobby. 02:37</p> <p>16 Q. Does he work in your apartment</p> <p>17 building?</p> <p>18 A. No.</p> <p>19 Q. Has he ever been to your apartment?</p> <p>20 A. Yes. 02:38</p> <p>21 Q. How often?</p> <p>22 A. Very frequent.</p> <p>23 Q. What does he do for you? (DIR)</p> <p>24 MR. HARMON: Direct the witness not to</p> <p>25 answer. 02:38</p> <p style="text-align: right;">Page 115</p>	<p>1 Guo Wengui</p> <p>2 Q. Who pays Han Chunguang?</p> <p>3 MR. GREIM: Object to the form.</p> <p>4 MR. HARMON: Object to the form of the</p> <p>5 question. 02:40</p> <p>6 A. I don't know.</p> <p>7 BY MR. GREIM:</p> <p>8 Q. Did you ever talk to him about Eastern</p> <p>9 Profit?</p> <p>10 A. No. 02:40</p> <p>11 Q. Has Eastern Profit's counsel ever</p> <p>12 interviewed you for purposes of this case?</p> <p>13 A. No.</p> <p>14 Q. Has Eastern Profit's counsel ever asked</p> <p>15 you questions for the purpose of this case? 02:41</p> <p>16 MR. HARMON: Just "yes" or "no."</p> <p>17 A. No.</p> <p>18 BY MR. GREIM:</p> <p>19 Q. Can you name any -- other than your</p> <p>20 daughter, which we're reserving, and 02:42</p> <p>21 Mr. Chunguang, can you name any other officers or</p> <p>22 directors of Eastern Profit?</p> <p>23 MR. GREIM: Objection to the form.</p> <p>24 MR. HARMON: Object to the form of the</p> <p>25 question. 02:42</p> <p style="text-align: right;">Page 117</p>

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<p>1 Guo Wengui</p> <p>2 A. I don't know.</p> <p>3 BY MR. GREIM:</p> <p>4 Q. Do you know when Eastern Profit was</p> <p>5 formed? 02:42</p> <p>6 A. I don't know.</p> <p>7 Q. Do you know where it's incorporated?</p> <p>8 A. No, I don't.</p> <p>9 Q. Can you name anyone who acts on behalf</p> <p>10 of Eastern Profit? 02:42</p> <p>11 MR. HARMON: Object to the form of the</p> <p>12 question.</p> <p>13 A. I don't know. No, I don't.</p> <p>14 BY MR. GREIM:</p> <p>15 Q. Have you ever acted on behalf of 02:43</p> <p>16 Eastern Profit?</p> <p>17 A. I don't remember.</p> <p>18 Q. Can you say definitively that you have</p> <p>19 not?</p> <p>20 A. I don't remember. 02:43</p> <p>21 Q. Have you ever spoken to an officer or</p> <p>22 director of Eastern Profit?</p> <p>23 A. I don't remember. I can't be sure. I</p> <p>24 don't know.</p> <p>25 Q. Did you understand Yvette Wang to be an 02:44</p> <p style="text-align: right;">Page 118</p>	<p>1 Guo Wengui</p> <p>2 Communist Party are after. They're asking the</p> <p>3 same questions. And people like Sun Lijun, things</p> <p>4 like this, he will want to know. So if you keep</p> <p>5 me asking questions about my daughter or my family 02:46</p> <p>6 members, I just need to call 911, call the police.</p> <p>7 Q. Have you spoken with your daughter</p> <p>8 about Eastern Profit?</p> <p>9 A. (No response.)</p> <p>10 CHECK INTERPRETER: Oh, and then, also, 02:46</p> <p>11 the witness said that Sun Lijun has arrested my</p> <p>12 daughter twice, put her in prison twice.</p> <p>13 BY MR. GREIM:</p> <p>14 Q. I'm sorry. I want to understand that.</p> <p>15 Who has put your daughter in prison 02:47</p> <p>16 twice?</p> <p>17 A. Sun Lijun.</p> <p>18 Q. Okay. There's a question where I did</p> <p>19 not see a response.</p> <p>20 My question was, have you spoken with 02:47</p> <p>21 your daughter about Eastern Profit?</p> <p>22 MR. HARMON: His answer was no.</p> <p>23 A. No.</p> <p>24 BY MR. GREIM:</p> <p>25 Q. Do you know anyone your daughter has 02:47</p> <p style="text-align: right;">Page 120</p>
<p>1 Guo Wengui</p> <p>2 officer or a director of Eastern Profit?</p> <p>3 A. No.</p> <p>4 Q. Did you understand her to be someone</p> <p>5 who is working on behalf of Eastern Profit? 02:44</p> <p>6 A. No.</p> <p>7 CHECK INTERPRETER: I don't know.</p> <p>8 A. No, I don't know.</p> <p>9 BY MR. GREIM:</p> <p>10 Q. Would it surprise you to learn that 02:44</p> <p>11 Yvette Wang has acted on behalf of Eastern Profit?</p> <p>12 MR. HARMON: Object to the form of the</p> <p>13 question.</p> <p>14 A. I cannot tell you anything regarding</p> <p>15 things that have or have not happened. 02:44</p> <p>16 BY MR. GREIM:</p> <p>17 Q. I want to go back and ask you a few</p> <p>18 questions relating to your daughter in Eastern</p> <p>19 Profit.</p> <p>20 Is your daughter in the United States? 02:45</p> <p>21 A. I cannot -- unless you can sign a</p> <p>22 letter of guarantee, I cannot tell you anything</p> <p>23 related to my daughter or my family members. All</p> <p>24 these questions you ask regarding my daughter and</p> <p>25 my family members are questions that the Chinese 02:46</p> <p style="text-align: right;">Page 119</p>	<p>1 Guo Wengui</p> <p>2 spoken with about Eastern Profit?</p> <p>3 A. That, I don't know.</p> <p>4 Q. Have Yvette -- has Yvette Wang spoken</p> <p>5 to your daughter about Eastern Profit? 02:48</p> <p>6 A. No.</p> <p>7 Q. How can you be certain?</p> <p>8 A. No. I mean I don't know.</p> <p>9 Q. Is your daughter also seeking asylum?</p> <p>10 (DIR) 12:00</p> <p>11 MR. HARMON: Don't answer the question.</p> <p>12 BY MR. GREIM:</p> <p>13 Q. Are you going to abide by your</p> <p>14 counsel's instruction?</p> <p>15 A. Yes. I refuse to answer this question. 02:48</p> <p>16 Q. Is Yvette Wang seeking asylum?</p> <p>17 A. I refuse to answer this question.</p> <p>18 Q. Does Eastern Profit have any</p> <p>19 shareholders?</p> <p>20 A. I don't know. 02:49</p> <p>21 Q. Does it have any investors?</p> <p>22 A. I don't know.</p> <p>23 Q. Do you know who knows the answer to</p> <p>24 those questions?</p> <p>25 A. I don't know. 02:49</p> <p style="text-align: right;">Page 121</p>

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<p>1 Guo Wengui</p> <p>2 twitters of the two clients.</p> <p>3 Q. Okay. Let's now turn to -- by the way,</p> <p>4 have you seen pages 42 through 44 before today?</p> <p>5 A. It's public information. It's 02:59</p> <p>6 everywhere.</p> <p>7 Q. If that is true, sir, how can any harm</p> <p>8 come from disclosing those pages?</p> <p>9 MR. HARMON: Object to the form of the</p> <p>10 question. 02:59</p> <p>11 A. You ask a good question. So,</p> <p>12 precisely, currently, in Xinjiang, we know that.</p> <p>13 We know a lot of people I know in Xinjiang, bad</p> <p>14 things are happening. However, if we have a</p> <p>15 specific person getting in front of the line, 03:00</p> <p>16 telling that, okay, me, certain people, certain</p> <p>17 person, are accusing the Chinese government of</p> <p>18 doing certain things --</p> <p>19 CHECK INTERPRETER: No. Chinese</p> <p>20 Communist Party. 03:00</p> <p>21 A. -- that person --</p> <p>22 CHECK INTERPRETER: Chinese Communist</p> <p>23 Party.</p> <p>24 A. -- Chinese Communist Party, that person</p> <p>25 will get killed right away. 03:00</p> <p style="text-align: right;">Page 126</p>	<p>1 Guo Wengui</p> <p>2 MR. HARMON: Asked and answered.</p> <p>3 Do it again.</p> <p>4 A. Because Ms. Wang and her family members</p> <p>5 are victims. They are being threatened. 03:02</p> <p>6 BY MR. GREIM:</p> <p>7 Q. But how could you be sure that Eastern</p> <p>8 Profit would follow Ms. Wang's advice?</p> <p>9 MR. GRENDI: Objection to the form.</p> <p>10 MR. HARMON: Join. 03:03</p> <p>11 A. I could not be sure.</p> <p>12 BY MR. GREIM:</p> <p>13 Q. And your testimony today is that you</p> <p>14 have no idea who controls Eastern Profit?</p> <p>15 A. You're right. 03:03</p> <p>16 Q. Was it important to you to know who was</p> <p>17 paying Yvette Wang before you gave her this</p> <p>18 recommendation?</p> <p>19 MR. HARMON: Object to the form of the</p> <p>20 question. 03:03</p> <p>21 MR. GRENDI: Object to the form.</p> <p>22 A. What do you mean by pay? Pay money?</p> <p>23 BY MR. GREIM:</p> <p>24 Q. Yes.</p> <p>25 MR. HARMON: Object to the form of the 03:04</p> <p style="text-align: right;">Page 128</p>
<p>1 Guo Wengui</p> <p>2 It's the same story here. We all know --</p> <p>3 people around the world know what kind of evil</p> <p>4 deeds the Chinese Communist Party is doing;</p> <p>5 however, if I come out there as an individual and 03:00</p> <p>6 make this statement as an individual, on a</p> <p>7 personal level, then I myself will get killed.</p> <p>8 Anybody who dares to make that personal statement</p> <p>9 will get killed. That's why your clients are very</p> <p>10 evil, in the sense that they are threatening to 03:01</p> <p>11 release those two -- relevant information, to get</p> <p>12 us killed.</p> <p>13 BY MR. GREIM:</p> <p>14 Q. Do you know -- do you know why Eastern</p> <p>15 Profit wanted to investigate person number 7, Tian 03:01</p> <p>16 Ding?</p> <p>17 A. No, I don't know.</p> <p>18 Q. Did you have any concern, when you</p> <p>19 provided this recommendation to Yvette Wang, that</p> <p>20 Eastern Profit would use the investigation results 03:01</p> <p>21 for purposes that were at odds with yours?</p> <p>22 MR. GRENDI: Objection to the form.</p> <p>23 A. I was not worried.</p> <p>24 BY MR. GREIM:</p> <p>25 Q. Why not? 03:02</p> <p style="text-align: right;">Page 127</p>	<p>1 Guo Wengui</p> <p>2 question.</p> <p>3 INTERPRETER: I'll repeat the question.</p> <p>4 Was it important to know who was paying Ms. Wang</p> <p>5 before you make the recommendation? That's the 03:04</p> <p>6 question, right?</p> <p>7 MR. GREIM: Correct.</p> <p>8 CHECK INTERPRETER: He said that he</p> <p>9 doesn't understand the question.</p> <p>10 INTERPRETER: He doesn't understand the 03:04</p> <p>11 question.</p> <p>12 BY MR. GREIM:</p> <p>13 Q. You recommended person number 7 to</p> <p>14 Yvette Wang, correct?</p> <p>15 A. Yes. 03:05</p> <p>16 Q. Did you know what she was going to do</p> <p>17 with the information?</p> <p>18 A. I didn't know.</p> <p>19 Q. Did you know she was going to share it</p> <p>20 with Eastern Profit? 03:05</p> <p>21 MR. HARMON: Object to the form of the</p> <p>22 question.</p> <p>23 MR. GRENDI: Objection to the form.</p> <p>24 A. I didn't know.</p> <p>25 BY MR. GREIM: 03:05</p> <p style="text-align: right;">Page 129</p>

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<p>1 Guo Wengui</p> <p>2 Q. Did you know that she was working with</p> <p>3 Eastern Profit?</p> <p>4 A. I didn't know.</p> <p>5 CHECK INTERPRETER: Counsel, are you 03:05</p> <p>6 asking does the witness know, or are you asking</p> <p>7 whether he knows?</p> <p>8 MR. GREIM: He is the witness.</p> <p>9 CHECK INTERPRETER: Yes. So you're</p> <p>10 asking, does he know whether he knows, or if he 03:05</p> <p>11 knows? You're asking --</p> <p>12 MR. GREIM: I don't think I understand</p> <p>13 your question. I think my question was clear. I</p> <p>14 think I got an answer.</p> <p>15 CHECK INTERPRETER: Yes, because I feel 03:06</p> <p>16 like that -- never mind.</p> <p>17 MR. HARMON: Let's move on.</p> <p>18 BY MR. GREIM:</p> <p>19 Q. At the time you gave this information</p> <p>20 to Yvette Wang, did you know who her employer was? 03:06</p> <p>21 MR. HARMON: Object to the form of the</p> <p>22 question.</p> <p>23 A. I did not know.</p> <p>24 BY MR. GREIM:</p> <p>25 Q. Did you -- at the time you gave this 03:06</p> <p style="text-align: right;">Page 130</p>	<p>1 Guo Wengui</p> <p>2 president of Chinese Commerce Bank -- Bank of --</p> <p>3 Commerce Bank.</p> <p>4 Q. Is he any relation to person number 7,</p> <p>5 Tian Ding? 03:09</p> <p>6 A. I don't know. They're probably</p> <p>7 friends. I don't know.</p> <p>8 Q. Did you recommend number 8 to Mrs. --</p> <p>9 I'm sorry -- Ms. Wang?</p> <p>10 A. I did make the recommendation. 03:09</p> <p>11 Q. Why?</p> <p>12 A. To investigate Wang Qishan and his</p> <p>13 father, and he himself, you know, the kind of</p> <p>14 wealth that they have stolen from the Chinese</p> <p>15 people. 03:09</p> <p>16 Q. Is -- do you have any objection to the</p> <p>17 disclosure of pages 45 through 49, as well as</p> <p>18 page 47, in this case?</p> <p>19 A. I object 100 percent.</p> <p>20 Q. Why? 03:10</p> <p>21 A. Same reason. If Wang Qishan finds out</p> <p>22 about this, my family members, family members of</p> <p>23 Ms. Wang, get killed.</p> <p>24 Q. Does Ms. Wang have two family members</p> <p>25 who are police in Hong Kong? 03:11</p> <p style="text-align: right;">Page 132</p>
<p>1 Guo Wengui</p> <p>2 information to Yvette Wang, did you know whether</p> <p>3 she was receiving a salary or any kind of payment</p> <p>4 from any other person?</p> <p>5 MR. HARMON: Object to the form of the 03:06</p> <p>6 question.</p> <p>7 MR. GREIM: Object to the form.</p> <p>8 A. I did not know.</p> <p>9 BY MR. GREIM:</p> <p>10 Q. Let's turn to person number 8, on 03:07</p> <p>11 page 45. And, sir, you'll see that pages 45, 46,</p> <p>12 48, and 49 follow, and page 47 is missing.</p> <p>13 A. I did not notice.</p> <p>14 Q. And -- well, if you look right before</p> <p>15 page 45, you'll see that page 47 is before it. 03:07</p> <p>16 A. Oh, okay.</p> <p>17 Q. And you'll see -- well, I just want to</p> <p>18 draw that to your attention before we go into</p> <p>19 these. I just noticed it myself.</p> <p>20 Now, my question is, what name is next to 03:08</p> <p>21 number 8?</p> <p>22 A. Tian Yuanan.</p> <p>23 Q. Who is that?</p> <p>24 A. He was the other secretary of Mr. Wang</p> <p>25 Qishan. He's actually the son of the current 03:08</p> <p style="text-align: right;">Page 131</p>	<p>1 Guo Wengui</p> <p>2 MR. HARMON: Object to the form of the</p> <p>3 question.</p> <p>4 A. I don't know. If you know that</p> <p>5 information, I will be interested to know if they 03:11</p> <p>6 have two family members of police in Hong Kong.</p> <p>7 This is the first time I've heard of it. I think</p> <p>8 you're just following the clients by spreading</p> <p>9 rumors.</p> <p>10 BY MR. GREIM: 03:11</p> <p>11 Q. How about in Mainland China?</p> <p>12 MR. HARMON: Is that a question?</p> <p>13 A. I don't know.</p> <p>14 MR. HARMON: Is that a question?</p> <p>15 MR. GREIM: It was, and he answered. 03:11</p> <p>16 MR. HARMON: As long as you both</p> <p>17 understood what the question is.</p> <p>18 BY MR. GREIM:</p> <p>19 Q. Okay. Can you please turn to page 50</p> <p>20 now. And if you could look at pages 50 to 53, 03:12</p> <p>21 we'll treat those together.</p> <p>22 Who is the person listed as number 9?</p> <p>23 A. Zhou Lei.</p> <p>24 Q. Who is that person?</p> <p>25 A. I don't know. 03:12</p> <p style="text-align: right;">Page 133</p>

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<p>1 Guo Wengui</p> <p>2 question.</p> <p>3 A. No.</p> <p>4 BY MR. GREIM:</p> <p>5 Q. Was it important to you, before 04:03</p> <p>6 entering -- strike that.</p> <p>7 Was it important to you that Strategic</p> <p>8 Vision be licensed as investigators?</p> <p>9 MR. GRENDI: Object to the form.</p> <p>10 A. So the first time -- the first time we 04:04</p> <p>11 met, they already told us they have all the</p> <p>12 investigative licenses and all the legal licenses.</p> <p>13 They told me that. And they also boasted about</p> <p>14 their European teams. And then the gentleman</p> <p>15 boasted about his experience with the CIA, the 04:05</p> <p>16 so-called Black Water Company. They told me they</p> <p>17 are fully licensed firm with years and years of</p> <p>18 experience. They mention that they were helping</p> <p>19 to get Trump elected and helping the Republican</p> <p>20 Party, and then they also boasted about helping 04:05</p> <p>21 forces in Russia that were going against Putin.</p> <p>22 And they told me that, you know, they had all the</p> <p>23 licenses necessary. They had all the resources</p> <p>24 and all the teams in place to help do the</p> <p>25 investigation. 04:05</p> <p style="text-align: right;">Page 150</p>	<p>1 Guo Wengui</p> <p>2 MR. HARMON: Object to the form of the</p> <p>3 question.</p> <p>4 A. This lady told me that she could</p> <p>5 connect me with anybody within CIA. Also -- the 04:07</p> <p>6 gentleman also made that claim, and I did not have</p> <p>7 all that resources to connect to anybody at CIA.</p> <p>8 So they mentioned that they could connect me to</p> <p>9 anybody within CIA. Back then, I did not have any</p> <p>10 contacts with CIA. 04:07</p> <p>11 BY MR. GREIM:</p> <p>12 Q. Wait a minute.</p> <p>13 When did you begin to have contacts with</p> <p>14 the CIA and FBI?</p> <p>15 MR. HARMON: Object to the form of the 04:07</p> <p>16 question.</p> <p>17 A. I do not have contact with CIA. I did</p> <p>18 not have contact with CIA. I was waiting on these</p> <p>19 two individuals to connect me to CIA.</p> <p>20 BY MR. GREIM: 04:08</p> <p>21 Q. And you eventually did make contact</p> <p>22 with the FBI and CIA, correct?</p> <p>23 MR. HARMON: Object to the form of the</p> <p>24 question.</p> <p>25 A. No. 04:08</p> <p style="text-align: right;">Page 152</p>
<p>1 Guo Wengui</p> <p>2 Of course, without licenses, why would I</p> <p>3 have partnered up with them? Why would I have</p> <p>4 worked with them? I would not even have paid</p> <p>5 attention to them. 04:05</p> <p>6 BY MR. GREIM:</p> <p>7 Q. Did you check to ensure that they were</p> <p>8 in fact licensed?</p> <p>9 MR. GRENDI: Object to the form.</p> <p>10 A. I did not do any check. 04:06</p> <p>11 BY MR. GREIM:</p> <p>12 Q. Now, at that time, you employed T&M</p> <p>13 Security, didn't you?</p> <p>14 MR. HARMON: Object to the form of the</p> <p>15 question. 04:06</p> <p>16 A. I don't remember. I can't be sure.</p> <p>17 BY MR. GREIM:</p> <p>18 Q. And they are licensed private</p> <p>19 investigators, are they not?</p> <p>20 A. I don't know. 04:06</p> <p>21 Q. Have you ever checked to see whether</p> <p>22 they were licensed?</p> <p>23 A. I did not. No, I did not check.</p> <p>24 Q. Did you check with your contacts at the</p> <p>25 CIA and FBI about Strategic Vision? 04:06</p> <p style="text-align: right;">Page 151</p>	<p>1 Guo Wengui</p> <p>2 BY MR. GREIM:</p> <p>3 Q. Haven't you publicly stated recently</p> <p>4 that you've had hundreds of contacts with the FBI</p> <p>5 and CIA? 04:08</p> <p>6 MR. GRENDI: Objection to the form.</p> <p>7 A. I don't recall that.</p> <p>8 BY MR. GREIM:</p> <p>9 Q. Okay. Let's go back.</p> <p>10 Did you have T&M Security do an 04:09</p> <p>11 investigation into Strategic Vision before the</p> <p>12 contract negotiation?</p> <p>13 MR. GRENDI: Objection to the form.</p> <p>14 A. No.</p> <p>15 BY MR. GREIM: 04:09</p> <p>16 Q. Did you have them do an investigation</p> <p>17 into Strategic Vision while it was performing the</p> <p>18 contract?</p> <p>19 A. No.</p> <p>20 Q. Did you have anyone do an investigation 04:09</p> <p>21 into Strategic Vision before beginning contract</p> <p>22 negotiations?</p> <p>23 MR. HARMON: Object to the form of the</p> <p>24 question.</p> <p>25 MR. GRENDI: Objection to form. 04:10</p> <p style="text-align: right;">Page 153</p>

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<p>1 Guo Wengui</p> <p>2 Wang, did anyone else ever attend a meeting</p> <p>3 between you and Strategic Vision?</p> <p>4 A. I don't remember very clearly.</p> <p>5 Q. Did Han Chunguang ever attend a meeting 04:19</p> <p>6 between you and Strategic Vision about the</p> <p>7 research?</p> <p>8 A. Of course not.</p> <p>9 Q. Why are you laughing, sir?</p> <p>10 A. Because I feel happy. I'm very happy. 04:19</p> <p>11 Q. Is there something funny about Han</p> <p>12 Chunguang attending a meeting to discuss the</p> <p>13 research?</p> <p>14 A. No. No, no. I think it's in your</p> <p>15 head. 04:19</p> <p>16 Q. Okay. Do you recall asking that</p> <p>17 Strategic Vision do research on a test case before</p> <p>18 the contract was entered into?</p> <p>19 A. Yes. This, I remember.</p> <p>20 Q. Why was that important? 04:20</p> <p>21 MR. HARMON: Object to the form of the</p> <p>22 question.</p> <p>23 A. I did not ask for the test</p> <p>24 investigation. They offered to investigate two</p> <p>25 individuals for us as a test. Yeah, exactly. 04:20</p> <p style="text-align: right;">Page 158</p>	<p>1 Guo Wengui</p> <p>2 A. I think it was all deception. They</p> <p>3 made us really eager to try to get our hands on</p> <p>4 that information.</p> <p>5 BY MR. GREIM: 04:22</p> <p>6 Q. Other than yourself, who was deceived?</p> <p>7 MR. GRENDI: Objection to the form.</p> <p>8 A. In retrospect, Eastern Profit was</p> <p>9 deceived. Many other people, also, billions of</p> <p>10 people in China, also got deceived. 04:23</p> <p>11 BY MR. GREIM:</p> <p>12 Q. How do you know Eastern Profit was</p> <p>13 deceived?</p> <p>14 A. Because Eastern Profit is suing</p> <p>15 Strategic Vision. 04:23</p> <p>16 Q. Who at Eastern Profit was deceived?</p> <p>17 MR. GRENDI: Objection to the form.</p> <p>18 A. I don't know.</p> <p>19 BY MR. GREIM:</p> <p>20 Q. Can you name any individual, an 04:23</p> <p>21 officer, director, or agent of Eastern Profit, who</p> <p>22 was deceived by Strategic Vision?</p> <p>23 A. No.</p> <p>24 Q. Was Chunguang Han deceived?</p> <p>25 MR. GRENDI: Objection to the form. 04:24</p> <p style="text-align: right;">Page 160</p>
<p>1 Guo Wengui</p> <p>2 Why -- what happened later, you know, they told me</p> <p>3 that, oh, we found -- we located information that</p> <p>4 showed Wang Yao (phonetic) -- you know, Sun Yao</p> <p>5 (phonetic), the goddaughter of Wang Qishan, of 04:21</p> <p>6 hiding -- of laundering tens of billions of</p> <p>7 dollars or hundreds of billions of dollars in the</p> <p>8 banking system. They release that information to</p> <p>9 encourage us, to prod us into signing contract.</p> <p>10 So now that, in retrospect, this lady 04:21</p> <p>11 called Mr. Han in the middle of the night to come</p> <p>12 over to her apartment to look at the screen of the</p> <p>13 personal laptop. And on the laptop it shows that,</p> <p>14 you know, the goddaughter of Wang Qishan, you</p> <p>15 know, evidence regarding her laundering a lot of 04:22</p> <p>16 money in China civic bank. And Han saw that</p> <p>17 information and then told me that we should hurry</p> <p>18 up and sign contract because they found something</p> <p>19 juicy.</p> <p>20 BY MR. GREIM: 04:22</p> <p>21 Q. And did that help convince you to have</p> <p>22 the contract signed?</p> <p>23 MR. GRENDI: Objection to the form.</p> <p>24 MR. HARMON: Object to the form of the</p> <p>25 question. 04:22</p> <p style="text-align: right;">Page 159</p>	<p>1 Guo Wengui</p> <p>2 A. I don't know.</p> <p>3 BY MR. GREIM:</p> <p>4 Q. I'm going to show you what we marked as</p> <p>5 Exhibit 2 in the Wang deposition. 04:24</p> <p>6 (Exhibit 2, Research Agreement dated</p> <p>7 12/29/17, previously marked for</p> <p>8 identification.)</p> <p>9 A. I don't understand English. I can't</p> <p>10 read. 04:24</p> <p>11 Q. I understand. I'm going to -- I</p> <p>12 understand this document is written in English.</p> <p>13 I'll simply ask you to look at page 5 of the</p> <p>14 contract.</p> <p>15 Do you see Chinese characters signed in 04:25</p> <p>16 the bottom right?</p> <p>17 A. It's hard to tell. It's hard for me to</p> <p>18 tell. I can't tell whether they're Chinese</p> <p>19 characters or not. I can't tell. Your two</p> <p>20 translators read Chinese. Maybe you can tell. It 04:25</p> <p>21 could look like Japanese to me.</p> <p>22 Q. Does it look just like a scribble to</p> <p>23 you? You can't tell if it's a signature?</p> <p>24 A. It's not clear to me.</p> <p>25 MR. GREIM: Well, I'll ask -- I'm going 04:26</p> <p style="text-align: right;">Page 161</p>

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<p>1 Guo Wengui</p> <p>2 MR. GRENDI: Objection to the form.</p> <p>3 A. I don't remember.</p> <p>4 BY MR. GREIM:</p> <p>5 Q. Do you remember discussing that with 04:49</p> <p>6 French Wallop and Mike Waller?</p> <p>7 MR. GRENDI: Same objection.</p> <p>8 A. I don't remember.</p> <p>9 BY MR. GREIM:</p> <p>10 Q. You remember discussing that the 04:49</p> <p>11 companies who would pay Strategic Vision would not</p> <p>12 be Hong Kong- or Chinese-based companies, to avoid</p> <p>13 detection by the Chinese government?</p> <p>14 MR. GRENDI: Objection to the form.</p> <p>15 A. I don't remember. 04:50</p> <p>16 BY MR. GREIM:</p> <p>17 Q. Do you remember discussing with French</p> <p>18 Wallop and Michael Waller that you would not sign</p> <p>19 the contract but would have some other entity sign</p> <p>20 it? 04:50</p> <p>21 A. Pure lie. Impossible.</p> <p>22 Q. Why is it impossible?</p> <p>23 A. It's impossible for me to make that</p> <p>24 statement. I did not have the right. I did not</p> <p>25 have authority. 04:50</p> <p style="text-align: right;">Page 174</p>	<p>1 Guo Wengui</p> <p>2 Wallop and Michael Waller told you to anyone else?</p> <p>3 MR. HARMON: Object to the form.</p> <p>4 Anything that they said, or on a</p> <p>5 particular subject? It's awfully broad. 04:52</p> <p>6 A. I don't remember.</p> <p>7 BY MR. GREIM:</p> <p>8 Q. Well, you said that French Wallop and</p> <p>9 Michael Waller said that they had teams in Europe</p> <p>10 and had contacts at the CIA and FBI and had access 04:52</p> <p>11 to all kinds of information.</p> <p>12 You remember, you testified earlier today</p> <p>13 that they made those representations to you?</p> <p>14 MR. HARMON: Object to the form of the</p> <p>15 question. 04:53</p> <p>16 CHECK INTERPRETER: (Speaking Chinese.)</p> <p>17 A. Yes.</p> <p>18 BY MR. GREIM:</p> <p>19 Q. Was anyone else present when they said</p> <p>20 those things to you? 04:53</p> <p>21 A. I don't remember.</p> <p>22 Q. If anyone else was present, was it</p> <p>23 anyone other than Yvette Wang and Lianchao Han?</p> <p>24 A. I don't remember.</p> <p>25 Q. Did you ever repeat the promises we 04:54</p> <p style="text-align: right;">Page 176</p>
<p>1 Guo Wengui</p> <p>2 Q. Do you know how it is that Eastern</p> <p>3 Profit ended up contracting with Strategic Vision</p> <p>4 instead of you?</p> <p>5 MR. HARMON: Object to the form of the 04:51</p> <p>6 question.</p> <p>7 MR. GRENDI: Objection to the form.</p> <p>8 A. I don't know why.</p> <p>9 BY MR. GREIM:</p> <p>10 Q. Did you ever communicate the promises 04:51</p> <p>11 that Strategic Vision made to you, to Eastern</p> <p>12 Profit?</p> <p>13 MR. HARMON: Object to the form of the</p> <p>14 question.</p> <p>15 A. No. 04:51</p> <p>16 BY MR. GREIM:</p> <p>17 Q. So did Eastern Profit ever learn about</p> <p>18 all the representations you say French Wallop and</p> <p>19 Michael Waller made to you?</p> <p>20 MR. HARMON: Object to the form of the 04:52</p> <p>21 question.</p> <p>22 MR. GRENDI: Objection to the form.</p> <p>23 A. I don't know.</p> <p>24 BY MR. GREIM:</p> <p>25 Q. Well, did you ever repeat what French 04:52</p> <p style="text-align: right;">Page 175</p>	<p>1 Guo Wengui</p> <p>2 just discussed to anyone at Eastern Profit?</p> <p>3 MR. HARMON: Objection to the form of</p> <p>4 the question.</p> <p>5 A. I don't remember. 04:54</p> <p>6 BY MR. GREIM:</p> <p>7 Q. Do you know whether Eastern Profit</p> <p>8 relied on the promises that French Wallop and</p> <p>9 Michael Waller made to you?</p> <p>10 MR. HARMON: Object to the form of the 04:54</p> <p>11 question.</p> <p>12 INTERPRETER: He wants me to repeat the</p> <p>13 question.</p> <p>14 (Interpreter repeats question.)</p> <p>15 A. I don't know. 04:55</p> <p>16 BY MR. GREIM:</p> <p>17 Q. Who does know?</p> <p>18 A. I don't know.</p> <p>19 Q. Does Yvette Wang know?</p> <p>20 A. I don't know. 04:55</p> <p>21 THE WITNESS: What is he laughing</p> <p>22 there?</p> <p>23 (Witness spoke in English.)</p> <p>24 A. Why are you laughing me?</p> <p>25 (Witness spoke in English.) 04:55</p> <p style="text-align: right;">Page 177</p>

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<p>1 Guo Wengui</p> <p>2 A. No.</p> <p>3 Q. Was the real estate to be for</p> <p>4 Mrs. Wang?</p> <p>5 INTERPRETER: Sorry. Say that again. 05:04</p> <p>6 BY MR. GREIM:</p> <p>7 Q. Was the real estate to be for</p> <p>8 Mrs. Wang?</p> <p>9 A. I don't know. I don't know.</p> <p>10 INTERPRETER: Could be imagination, he 05:04</p> <p>11 said.</p> <p>12 BY MR. GREIM:</p> <p>13 Q. Do you recall Strategic Vision asking</p> <p>14 for a \$1 million deposit in advance of the</p> <p>15 contract? 05:05</p> <p>16 A. I don't remember.</p> <p>17 Q. Do you recall Strategic Vision</p> <p>18 receiving a \$1 million deposit in advance of the</p> <p>19 contract?</p> <p>20 A. Yes, I know. I'm aware. 05:05</p> <p>21 Q. Do you know how Eastern Profit came up</p> <p>22 with the money to pay the million-dollar deposit?</p> <p>23 A. I don't know.</p> <p>24 Q. Did you order a release of \$1 million</p> <p>25 to pay the deposit to Strategic Vision? 05:05</p> <p style="text-align: right;">Page 182</p>	<p>1 Guo Wengui</p> <p>2 INTERPRETER: He wants me to repeat the</p> <p>3 name of the company. (Interpreter repeats.)</p> <p>4 MR. GREIM: Capital Group.</p> <p>5 A. I cannot be 100 percent sure, because 05:27</p> <p>6 there are so many ACA -- companies with the name</p> <p>7 of ACA.</p> <p>8 BY MR. GREIM:</p> <p>9 Q. Well, do you know who wired the million</p> <p>10 dollars under this contract to Strategic Vision? 05:27</p> <p>11 A. All I know is there's a company called</p> <p>12 ACA Management Company. So I'm not sure it's</p> <p>13 actually the same with the one you referred to</p> <p>14 here.</p> <p>15 Q. What do you know about ACA Management 05:28</p> <p>16 Company?</p> <p>17 A. So just a person you mentioned earlier,</p> <p>18 William Zhi (phonetic). He's actually an officer</p> <p>19 of this company, and I know it because we are</p> <p>20 doing the same cause, which is to overthrow the 05:28</p> <p>21 Chinese Communist Party.</p> <p>22 Q. Is William Zhi (phonetic) a longtime</p> <p>23 friend of yours?</p> <p>24 A. Probably long time, but exactly how</p> <p>25 long, I cannot be sure. 05:29</p> <p style="text-align: right;">Page 184</p>
<p>1 Guo Wengui</p> <p>2 A. No.</p> <p>3 Q. Did you order a release of \$1 million</p> <p>4 from ACA to pay Strategic Vision?</p> <p>5 MR. GREIM: Object to the form. 05:06</p> <p>6 A. No, I did not order.</p> <p>7 BY MR. GREIM:</p> <p>8 Q. Have you ever heard of --</p> <p>9 MR. GREIM: You know, let's go ahead</p> <p>10 and take our break now. 05:06</p> <p>11 VIDEOGRAPHER: The time is</p> <p>12 approximately 5:06 p.m., Friday, August 2, 2019.</p> <p>13 This is the end of media number 4 of the</p> <p>14 videotaped deposition of Mr. Guo Wengui. We are</p> <p>15 off the record. 05:06</p> <p>16 (Recess taken.)</p> <p>17 VIDEOGRAPHER: The time is</p> <p>18 approximately 5:26 p.m., Friday, August 2, 2019.</p> <p>19 This is media number 5 of the videotaped</p> <p>20 deposition of Mr. Guo Wengui. We're back on the 05:26</p> <p>21 record.</p> <p>22 CONTINUED EXAMINATION</p> <p>23 BY MR. GREIM:</p> <p>24 Q. Mr. Guo, have you heard of an entity</p> <p>25 called ACA Capital Group Limited? 05:27</p> <p style="text-align: right;">Page 183</p>	<p>1 Guo Wengui</p> <p>2 Q. Is he a -- okay. Are you familiar --</p> <p>3 strike that.</p> <p>4 Is Mr. Zhi (phonetic) a director of ACA</p> <p>5 Capital Group Limited? 05:29</p> <p>6 A. I don't know.</p> <p>7 Q. Is Karin Maistrello a director of ACA</p> <p>8 Capital Group Limited?</p> <p>9 A. I don't know.</p> <p>10 Q. Have you ever owned or controlled any 05:30</p> <p>11 entity with "ACA" in the name?</p> <p>12 MR. HARMON: Object to the form of the</p> <p>13 question.</p> <p>14 A. No.</p> <p>15 BY MR. GREIM: 05:30</p> <p>16 Q. Have you ever owned or controlled, even</p> <p>17 if indirectly, an entity with "ACA" in the name?</p> <p>18 MR. HARMON: Object to the form of the</p> <p>19 question.</p> <p>20 MR. GREIM: Object to the form of the 05:30</p> <p>21 question.</p> <p>22 A. I don't remember.</p> <p>23 BY MR. GREIM:</p> <p>24 Q. Didn't you invest in Haitong Securities</p> <p>25 through an ACA entity? (DIR) 05:31</p> <p style="text-align: right;">Page 185</p>

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<p>1 Guo Wengui</p> <p>2 work on your behalf?</p> <p>3 A. I don't know.</p> <p>4 Q. Well, now I'm going to go back, and I'm</p> <p>5 going to -- you say you don't know. I'm going to 05:46</p> <p>6 ask you again.</p> <p>7 Did it wire the million dollars to</p> <p>8 Williams and Connolly in September of 2017 to work</p> <p>9 on your asylum case? (DIR)</p> <p>10 MR. HARMON: Direct the witness not to 05:47</p> <p>11 answer.</p> <p>12 A. I refuse to answer this question.</p> <p>13 MR. GREIM: You are blocking my ability</p> <p>14 to show that Mr. Guo actually exercises control</p> <p>15 over ACA and uses its funds for his own personal 05:47</p> <p>16 purposes.</p> <p>17 MR. HARMON: There's no question</p> <p>18 pending.</p> <p>19 INTERPRETER: Are you a judge? I mean,</p> <p>20 can you make that decision? 05:47</p> <p>21 A. This is completely in the style of the</p> <p>22 Chinese Communist Party; resort to threat and</p> <p>23 similar to the clients.</p> <p>24 BY MR. GREIM:</p> <p>25 Q. Did there come a time when Eastern 05:48</p> <p style="text-align: right;">Page 194</p>	<p>1 Guo Wengui</p> <p>2 A. He's not providing any services to me.</p> <p>3 Q. Why does he come to your building?</p> <p>4 A. I don't know.</p> <p>5 Q. Have you ever given him any direction? 05:50</p> <p>6 MR. HARMON: Object to the form of the</p> <p>7 question.</p> <p>8 MR. GRENDI: Object to the form.</p> <p>9 A. No.</p> <p>10 BY MR. GREIM: 05:51</p> <p>11 Q. Who is his employer?</p> <p>12 A. I don't know.</p> <p>13 Q. Do you know who assigns him work?</p> <p>14 MR. HARMON: Object to the form of the</p> <p>15 question. 05:51</p> <p>16 MR. GRENDI: Object to the form.</p> <p>17 A. I don't know.</p> <p>18 BY MR. GREIM:</p> <p>19 Q. Have you ever seen him performing any</p> <p>20 kind of work in your building? 05:51</p> <p>21 A. I don't know what you mean by</p> <p>22 "services." What are the standards of service?</p> <p>23 What do you mean by service? I don't understand.</p> <p>24 Q. Does he come to your building for</p> <p>25 leisure and entertainment, or does he come to 05:51</p> <p style="text-align: right;">Page 196</p>
<p>1 Guo Wengui</p> <p>2 Profit attempted to reverse the million-dollar</p> <p>3 wire to Strategic Vision?</p> <p>4 A. I don't remember.</p> <p>5 Q. Who made the decision to seek the 05:49</p> <p>6 return of the million dollars wired to Strategic</p> <p>7 Vision?</p> <p>8 MR. HARMON: Object to the form of the</p> <p>9 question.</p> <p>10 A. I don't know. 05:49</p> <p>11 BY MR. GREIM:</p> <p>12 Q. Had you agreed with Strategic Vision</p> <p>13 that the million-dollar deposit would be routed</p> <p>14 through companies so that the Chinese could not</p> <p>15 trace the payment to Strategic Vision? 05:49</p> <p>16 MR. GRENDI: Objection to the form.</p> <p>17 A. I don't know.</p> <p>18 BY MR. GREIM:</p> <p>19 Q. Did there come some point when you told</p> <p>20 Strategic Vision that Eastern Profit would be the 05:49</p> <p>21 party contracting with it?</p> <p>22 A. I don't know.</p> <p>23 Q. Is Han Chunguang your cook?</p> <p>24 A. No.</p> <p>25 Q. What services does he provide to you? 05:50</p> <p style="text-align: right;">Page 195</p>	<p>1 Guo Wengui</p> <p>2 perform some sort of service?</p> <p>3 MR. HARMON: Object to the form of the</p> <p>4 question.</p> <p>5 A. No. 05:52</p> <p>6 BY MR. GREIM:</p> <p>7 Q. So, earlier, you testified that you see</p> <p>8 Han Chunguang frequently, and you said that he</p> <p>9 comes to your building frequently. And I'm asking</p> <p>10 why he comes there. 05:52</p> <p>11 MR. HARMON: Object to the form of the</p> <p>12 question, mischaracterization of private -- of</p> <p>13 prior testimony. He's answered the question now.</p> <p>14 He doesn't know why he comes there; I think that's</p> <p>15 what he said. If you ask that question without 05:52</p> <p>16 the predicate, I'll allow Mr. Guo to answer it</p> <p>17 again.</p> <p>18 A. So I will answer your question one more</p> <p>19 time. I stay at a hotel, and it's open to the</p> <p>20 public. Anybody can come to the hotel, including 05:53</p> <p>21 your two clients and their friends and the</p> <p>22 assassins who tried to kill me. They often visit</p> <p>23 the hotel. Do you think they are my friends? Do</p> <p>24 you think they were there to serve me?</p> <p>25 BY MR. GREIM: 05:53</p> <p style="text-align: right;">Page 197</p>

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<p>1 Guo Wengui</p> <p>2 A. Based on the kind of news that they</p> <p>3 released on the media.</p> <p>4 Q. I'm sorry.</p> <p>5 That who released on the media? 06:07</p> <p>6 A. Your clients.</p> <p>7 Q. Have you conferred with Eastern Profit</p> <p>8 about whether it repaid the million dollars?</p> <p>9 MR. GRENDI: Objection.</p> <p>10 A. I don't remember. 06:08</p> <p>11 BY MR. GREIM:</p> <p>12 Q. What did you expect Strategic Vision's</p> <p>13 reports under the contract to include?</p> <p>14 A. So it's pretty much, you know, what</p> <p>15 your clients told me initially -- to identify, to 06:08</p> <p>16 provide evidence in terms of what kind of crimes</p> <p>17 that they committed in the U.S., including money</p> <p>18 laundering; also, to identify the spies embedded</p> <p>19 in the U.S. so that we can rescue the Chinese</p> <p>20 people and to -- to rescue the Chinese people. 06:09</p> <p>21 CHECK INTERPRETER: And to show them</p> <p>22 the truth.</p> <p>23 A. And to show them the truth.</p> <p>24 BY MR. GREIM:</p> <p>25 Q. What did you expect Strategic Vision's 06:09</p> <p style="text-align: right;">Page 206</p>	<p>1 Guo Wengui</p> <p>2 research with anyone else?</p> <p>3 A. The U.S. government and the people of</p> <p>4 China.</p> <p>5 Q. How did you plan to share the 06:11</p> <p>6 information with the people of China?</p> <p>7 A. To release them to the media; to</p> <p>8 release the information to the media.</p> <p>9 Q. How did you intend to get the</p> <p>10 information to the U.S. government? 06:11</p> <p>11 A. Based on the legal procedures of the</p> <p>12 U.S.</p> <p>13 Q. Do you plan to file a lawsuit with the</p> <p>14 information?</p> <p>15 A. To answer your question, the plan is to 06:12</p> <p>16 file a lawsuit.</p> <p>17 Q. Who are you going to sue?</p> <p>18 A. Whoever commits a crime and we have the</p> <p>19 evidence.</p> <p>20 Q. At some point, did you ask Yvette Wang 06:14</p> <p>21 to tell Strategic Vision that it needed to give</p> <p>22 you research before January 26, 2018, because you</p> <p>23 had special plans for that day?</p> <p>24 A. I don't remember.</p> <p>25 Q. Do you remember what plans -- special 06:15</p> <p style="text-align: right;">Page 208</p>
<p>1 Guo Wengui</p> <p>2 weekly report to include?</p> <p>3 A. Including corruption of the Chinese</p> <p>4 Communist Party, their overseas spy network, their</p> <p>5 money-laundering evidence, as well as evidence 06:09</p> <p>6 regarding them stealing money from the Chinese</p> <p>7 people.</p> <p>8 Q. Did you expect Strategic Vision to</p> <p>9 provide you raw data only or analysis of the data?</p> <p>10 MR. GRENDI: Object to the form. 06:10</p> <p>11 A. Raw data, only raw data.</p> <p>12 BY MR. GREIM:</p> <p>13 Q. Why?</p> <p>14 A. Because we could use the raw data as</p> <p>15 evidence when we bring it to the court, a U.S. 06:10</p> <p>16 court.</p> <p>17 Q. Who is going to bring the evidence to a</p> <p>18 U.S. court?</p> <p>19 A. Of course, people like us, who share</p> <p>20 the same goal of overthrowing the Chinese 06:10</p> <p>21 Communist Party in the U.S. We, as a group.</p> <p>22 Q. Well, what -- did you discuss this plan</p> <p>23 with other people?</p> <p>24 A. I don't remember.</p> <p>25 Q. Well, were you planning on sharing the 06:11</p> <p style="text-align: right;">Page 207</p>	<p>1 Guo Wengui</p> <p>2 plans you had for January 26, 2018?</p> <p>3 A. I don't remember.</p> <p>4 Q. Do you remember having a meeting in</p> <p>5 your apartment with Yvette Wang, French Wallop, 06:15</p> <p>6 and Mike Waller on or about January 26th to</p> <p>7 discuss Strategic Vision's performance?</p> <p>8 A. I don't remember.</p> <p>9 Q. Would you have recorded that meeting?</p> <p>10 MR. HARMON: Object to the form of the 06:16</p> <p>11 question.</p> <p>12 A. I don't remember.</p> <p>13 BY MR. GREIM:</p> <p>14 Q. Do you remember giving Michael Waller a</p> <p>15 hug at the end of the meeting? 06:16</p> <p>16 A. If I did, I regret it big time. But I</p> <p>17 don't recall.</p> <p>18 Q. Do you remember telling him, we have to</p> <p>19 trust one another?</p> <p>20 A. He's a good storyteller, fiction. 06:16</p> <p>21 Q. So you deny that you told that to</p> <p>22 Mr. Waller?</p> <p>23 A. I don't remember.</p> <p>24 Q. Do you recall Strategic Vision</p> <p>25 explaining that it would not be immediately 06:16</p> <p style="text-align: right;">Page 209</p>

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<p>1 Guo Wengui</p> <p>2 possible to extract raw data from the private</p> <p>3 accounts of the 15 subjects?</p> <p>4 A. They never said anything like that.</p> <p>5 It's baloney. Because it seems to me that 06:17</p> <p>6 whenever they talked to me, they presented</p> <p>7 themselves as very good at everything. Everything</p> <p>8 is so easy. They can get their hands on any</p> <p>9 information. So because they told -- because they</p> <p>10 always told Han Lianchao -- Lianchao Han that 06:18</p> <p>11 they've been doing this work for a long, long</p> <p>12 time. Give us something more challenging.</p> <p>13 Q. Did Strategic Vision explain to you</p> <p>14 that forced entry into a server would be detected</p> <p>15 and likely provoke defensive measures, defeating 06:18</p> <p>16 the purpose of the work?</p> <p>17 A. This is pure fiction. This is pure</p> <p>18 fiction. Whenever we talked about the research, I</p> <p>19 always emphasized the legality. Our measures must</p> <p>20 be legal. We don't want to do anything illegal. 06:19</p> <p>21 So we never talked about forcing entry into</p> <p>22 servers. And every time they told me, they keep</p> <p>23 saying that -- don't worry. We know what's legal,</p> <p>24 what is legal, and we'll only use legal measures.</p> <p>25 You don't need to tell us what to do, and we've 06:19</p> <p style="text-align: right;">Page 210</p>	<p>1 Guo Wengui</p> <p>2 Q. Did you learn that, after Strategic</p> <p>3 Vision hired the Texas team, that many of the 15</p> <p>4 initial subjects were listed as "record protected"</p> <p>5 in government databases? 06:22</p> <p>6 MR. HARMON: Object to the form of the</p> <p>7 question.</p> <p>8 MR. GRENDI: Objection to the form.</p> <p>9 A. It's completely fiction. It's</p> <p>10 completely fiction. This is the first time I've 06:22</p> <p>11 ever heard of a Texas team, and I've never heard</p> <p>12 of it before. It's scary, kind of storytelling,</p> <p>13 kind of fiction.</p> <p>14 BY MR. GREIM:</p> <p>15 Q. Did Lianchao tell you that Strategic 06:23</p> <p>16 Vision was asking for different names to research</p> <p>17 that were not record-protected?</p> <p>18 MR. HARMON: Can you read the question</p> <p>19 back, please.</p> <p>20 (Record was read back.) 06:23</p> <p>21 A. Never. Never. It's all fiction. It's</p> <p>22 all fabrication, or fiction. I'm shocked.</p> <p>23 BY MR. GREIM:</p> <p>24 Q. Have you ever personally met with a</p> <p>25 team of Texas investigators? 06:24</p> <p style="text-align: right;">Page 212</p>
<p>1 Guo Wengui</p> <p>2 been doing this for a long time. We know what's</p> <p>3 legal, what we can do.</p> <p>4 Q. Did you ever report those statements</p> <p>5 from Strategic Vision to anyone at Eastern Profit? 06:19</p> <p>6 A. No.</p> <p>7 Q. Was anyone from Eastern Profit present</p> <p>8 when Strategic Vision made those statements?</p> <p>9 A. No.</p> <p>10 Q. By the beginning of February 2018, had 06:20</p> <p>11 you approved Strategic Vision using a second</p> <p>12 research team?</p> <p>13 MR. GRENDI: Object to the form.</p> <p>14 A. I didn't have the authority to approve</p> <p>15 anything; but, no. So the question is absurd. 06:20</p> <p>16 BY MR. GREIM:</p> <p>17 Q. Okay. Did you learn that Strategic</p> <p>18 Vision had begun to use a second team based in</p> <p>19 Texas?</p> <p>20 A. It's all fiction. It's like a movie; 06:21</p> <p>21 it's completely fiction. They don't even have one</p> <p>22 single employee, so they've given us baloney.</p> <p>23 Q. Did you receive reports from Liancho on</p> <p>24 Strategic Vision's performance?</p> <p>25 A. No. 06:21</p> <p style="text-align: right;">Page 211</p>	<p>1 Guo Wengui</p> <p>2 A. No. No. This is the first time I've</p> <p>3 ever heard of a Texas team. I feel like I'm an</p> <p>4 actor in a movie right now. I feel like this is</p> <p>5 not a very serious legal matter anymore. 06:24</p> <p>6 Q. Were you ultimately dissatisfied with</p> <p>7 the work that Strategic Vision delivered?</p> <p>8 A. Let me reemphasize, they never provided</p> <p>9 me with any report, work report. So it's not a</p> <p>10 matter of whether I'm satisfied with the report or 06:25</p> <p>11 not. It's just pure deception.</p> <p>12 Q. Well, let me ask you this: Are you</p> <p>13 aware that Mike Waller provided a thumb drive to</p> <p>14 Yvette Wang in Penn Station with data?</p> <p>15 MR. HARMON: Object to the form of the 06:26</p> <p>16 question.</p> <p>17 A. So all I know is that Wang told me that</p> <p>18 all these alleged evidence regarding me suing --</p> <p>19 money laundering was nonexistent. All the</p> <p>20 information was gathered from social media, from 06:26</p> <p>21 the Internet, from Facebook. And then she told me</p> <p>22 that we've been cheated and there's nothing we can</p> <p>23 do other than to file a lawsuit.</p> <p>24 BY MR. GREIM:</p> <p>25 Q. Did you agree with Yvette Wang that a 06:26</p> <p style="text-align: right;">Page 213</p>

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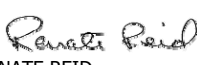
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<p>1 Guo Wengui</p> <p>2 lawsuit should be filed?</p> <p>3 A. I completely agree with her.</p> <p>4 Q. Did either you or Yvette check with Han</p> <p>5 Chunguang to obtain his approval before filing the 06:27</p> <p>6 lawsuit?</p> <p>7 MR. HARMON: Object to the form of the</p> <p>8 question.</p> <p>9 MR. GRENDI: Object to the form of the</p> <p>10 question. 06:27</p> <p>11 A. No, I did not. I did not.</p> <p>12 BY MR. GREIM:</p> <p>13 Q. Do you know whether Yvette Wang did?</p> <p>14 A. That, I don't know.</p> <p>15 Q. Did either you or Yvette Wang check 06:27</p> <p>16 with your daughter for approval before filing the</p> <p>17 lawsuit?</p> <p>18 A. I don't know.</p> <p>19 Q. Well, do you know whether you checked</p> <p>20 with your daughter before -- for approval before 06:28</p> <p>21 the lawsuit was filed?</p> <p>22 A. I did not file a lawsuit, and I never</p> <p>23 discussed this matter with my daughter.</p> <p>24 Q. Do you know what person, who is either</p> <p>25 an officer, director, employee, or agent of 06:28</p> <p style="text-align: right;">Page 214</p>	<p>1 Guo Wengui</p> <p>2 what I said. So what I stated earlier was that,</p> <p>3 you know, Wang asked me whether we should file a</p> <p>4 lawsuit, and I told her I completely agree that we</p> <p>5 should file a lawsuit. So it's not discussion; 06:31</p> <p>6 it's just agreed.</p> <p>7 BY MR. GREIM:</p> <p>8 Q. Was anyone else present for that</p> <p>9 discussion?</p> <p>10 A. No. 06:31</p> <p>11 Q. Do you know -- did anyone inform</p> <p>12 Lianchao Han about the lawsuit before it was</p> <p>13 filed?</p> <p>14 A. I don't know.</p> <p>15 Q. Did Golden Spring New York Limited have 06:31</p> <p>16 a role in deciding to file this lawsuit?</p> <p>17 A. I don't know.</p> <p>18 Q. Before hiring Strategic Vision --</p> <p>19 strike that.</p> <p>20 Before you began your discussions with 06:33</p> <p>21 Strategic Vision, did you have any experience in</p> <p>22 hiring companies to investigate subjects?</p> <p>23 A. I don't know what you mean by</p> <p>24 "experience," so it's hard for me to answer this</p> <p>25 question. 06:33</p> <p style="text-align: right;">Page 216</p>
<p>1 Guo Wengui</p> <p>2 Eastern Profit, approved the filing of this</p> <p>3 lawsuit?</p> <p>4 MR. GRENDI: Objection to the form.</p> <p>5 A. No, I don't know. 06:28</p> <p>6 BY MR. GREIM:</p> <p>7 Q. Can you tell me what person, regardless</p> <p>8 of their role or status, approved the filing of</p> <p>9 this lawsuit?</p> <p>10 A. I don't know. 06:29</p> <p>11 Q. What person made the decision to</p> <p>12 terminate the contract?</p> <p>13 A. I don't know.</p> <p>14 Q. Was it Yvette Wang?</p> <p>15 A. I don't know. 06:29</p> <p>16 Q. Did you discuss the termination of the</p> <p>17 contract with Yvette Wang?</p> <p>18 A. No.</p> <p>19 Q. If I remember, a few moments ago, you</p> <p>20 said that you discussed the filing of the lawsuit 06:30</p> <p>21 with Yvette Wang.</p> <p>22 MR. HARMON: Object to the form of the</p> <p>23 question.</p> <p>24 MR. GRENDI: Objection.</p> <p>25 A. I think the attorney is fabricating 06:30</p> <p style="text-align: right;">Page 215</p>	<p>1 Guo Wengui</p> <p>2 Q. Had you done it before?</p> <p>3 A. No, never dealt with a company such as</p> <p>4 Strategic Vision. Never.</p> <p>5 Q. Had you dealt with investigators before 06:34</p> <p>6 hiring -- before Strategic Vision was hired?</p> <p>7 CHECK INTERPRETER: (Speaking Chinese.)</p> <p>8 INTERPRETER: Investigator,</p> <p>9 investigation company?</p> <p>10 BY MR. GREIM: 06:34</p> <p>11 Q. Individuals or a company, either one.</p> <p>12 A. You mean, me personally?</p> <p>13 Q. We'll start with you personally.</p> <p>14 A. No.</p> <p>15 Q. How about any company that you 06:34</p> <p>16 controlled or owned?</p> <p>17 A. No.</p> <p>18 MR. GREIM: Let me suggest this: Let's</p> <p>19 take -- let's take about a two-minute break.</p> <p>20 Let's all walk outside for a minute to cool off, 06:35</p> <p>21 and then I'll come in and do my final questions,</p> <p>22 okay?</p> <p>23 VIDEOGRAPHER: The time is</p> <p>24 approximately 6:35 p.m. We're off the record.</p> <p>25 (Recess taken.) 06:35</p> <p style="text-align: right;">Page 217</p>

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<p>1 Guo Wengui</p> <p>2 but, you know, for the solemn nature of -- you are</p> <p>3 being irresponsible. After seven hours of</p> <p>4 questioning; and then, all of a sudden, you threw</p> <p>5 out this piece of translation, which has not yet 07:01</p> <p>6 been verified.</p> <p>7 CHECK INTERPRETER: I heard, you know,</p> <p>8 a response, many times I have not been</p> <p>9 interviewed.</p> <p>10 BY MR. GREIM: 07:01</p> <p>11 Q. Has Eastern Profit --</p> <p>12 MR. HARMON: I thought you get one more</p> <p>13 question.</p> <p>14 MR. GREIM: Yeah, I know. Actually,</p> <p>15 this is for the last question. 07:01</p> <p>16 BY MR. GREIM:</p> <p>17 Q. Has Eastern Profit ever asked you to be</p> <p>18 its witness?</p> <p>19 A. I'm not going to answer your question,</p> <p>20 this question, because, earlier, you told me that 07:02</p> <p>21 the previous question was already the last</p> <p>22 question. And I respect you as a lawyer; I</p> <p>23 respect the dignity of the legal profession. And</p> <p>24 as a witness, I take this matter very seriously.</p> <p>25 And I hope that you will honor your statement. We 07:02</p> <p style="text-align: right;">Page 230</p>	<p>1 A C K N O W L E D G E M E N T</p> <p>2</p> <p>3 I, GUO WENGUI, do hereby acknowledge I have</p> <p>4 read and examined the foregoing pages of testimony,</p> <p>5 and the same is a true, correct and complete</p> <p>6 transcription of the testimony given by me, and any</p> <p>7 changes or corrections, if any, appear in the</p> <p>8 attached errata sheet signed by me.</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13 _____</p> <p>14 Date GUO WENGUI</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p> <p style="text-align: right;">Page 232</p>
<p>1 Guo Wengui</p> <p>2 all heard that the previous question was the last</p> <p>3 question, and I'm not going to answer your</p> <p>4 question. And you --</p> <p>5 Q. Well, thank you. 07:02</p> <p>6 MR. GREIM: We intend to hold this</p> <p>7 deposition open. I understand we're going to have</p> <p>8 an objection, probably, from the other parties.</p> <p>9 But we believe that Eastern Profit has not</p> <p>10 properly given us 30(b)(6) witnesses that can tell 07:02</p> <p>11 us anything about the entity, and we have many</p> <p>12 more questions of Mr. Guo that he was blocked from</p> <p>13 answering. And so we'll hold it open for those</p> <p>14 purposes.</p> <p>15 MR. HARMON: Thank you for your time. 07:04</p> <p>16 VIDEOGRAPHER: The time is</p> <p>17 approximately 7:03 p.m., Friday, August 2, 2019.</p> <p>18 This is the end of media number 5 and completes</p> <p>19 the videotaped deposition of Mr. Guo Wengui.</p> <p>20 We're off the record. 07:04</p> <p>21</p> <p>22 (Time noted: 7:03 p.m.)</p> <p>23</p> <p>24</p> <p>25</p> <p style="text-align: right;">Page 231</p>	<p>1 C E R T I F I C A T E O F N O T A R Y P U B L I C</p> <p>2 I, RENATE REID, the officer before whom the</p> <p>3 foregoing deposition was taken, do hereby certify</p> <p>4 that the witness, GUO WENGUI, whose testimony appears</p> <p>5 in the foregoing deposition, was duly sworn by me;</p> <p>6 that the testimony of said witness was taken by me in</p> <p>7 stenotype and thereafter reduced to typewriting under</p> <p>8 my direction; that said deposition is a true record</p> <p>9 of the testimony given by said witness;</p> <p>10 That I am neither counsel for, related to,</p> <p>11 nor employed by and of the parties to the action in</p> <p>12 which this deposition was taken; and, further, that I</p> <p>13 am not a relative or employee of any counsel or</p> <p>14 attorney employed by the parties hereto, nor</p> <p>15 financially or otherwise interested in the outcome of</p> <p>16 this action. The witness will sign.</p> <p>17 IN WITNESS WHEREOF, I have hereunto set</p> <p>18 my hand this 15th day of August, 2019.</p> <p>19</p> <p>20</p> <p>21 </p> <p>22 RENATE REID</p> <p>23 Notary Public in and for</p> <p>24 The State of New York</p> <p>25</p> <p style="text-align: right;">Page 233</p>

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